

The Honorable Mary Alice Theiler

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ARRIVALSTAR S.A. and MELVINO
TECHNOLOGIES LIMITED,

Plaintiffs,

v.

CENTRAL PUGET SOUND REGIONAL
TRANSIT AUTHORITY,

Defendants.

Civil Action No. 12-cv-977MAT

ANSWER TO COUNTERCLAIMS

JURY DEMAND

Plaintiffs ArrivalStar S.A. and Melvino Technologies Limited, by and through its counsel, answer the Defendant Central Puget Sound Regional Transit Authority's counterclaims as follows:

PARTIES

- 1. Admit.
- 2. Admit.
- 3. Admit.

JURISDICTION AND VENUE

- 4. Admit.
- 5. Admit.
- 6. Admit.

ACTUAL CASE AND CONTROVERSY

7. Admit.
8. Admit.
9. Admit.
10. Admit that the controversy should be promptly adjudicated, otherwise deny.

COUNT I: DECLARATORY JUDGMENT OF NON-INFRINGEMENT

11. Plaintiffs incorporate by reference their response to the foregoing paragraphs.
12. Deny.
13. Deny.
14. Deny.
15. Deny.
16. Admit that Defendant requests a declaratory judgment, otherwise deny.

COUNT II: DECLARATORY JUDGMENT OF PATENT INVALIDITY

17. Plaintiffs incorporate by reference their response to the foregoing paragraphs.
18. Deny.
19. Deny.
20. Deny.
21. Deny.
22. Admit that Defendant requests a declaratory judgment, otherwise deny.

COUNT III: DECLARATORY JUDGMENT OF PATENT UNENFORCEABILITY

23. Plaintiffs incorporate by reference their response to the foregoing paragraphs.
24. Admit that Plaintiffs have asserted their patent rights in over 25 lawsuits and have licensed the '781 patent to over 66 separate entities, otherwise deny.
25. Deny.
26. Admit that Defendant requests a declaratory judgment, otherwise deny.

1 RESPECTFULLY SUBMITTED this 6th day of August, 2012.
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20 Melvino Technologies Limited
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was electronically filed through the CM/ECF system, which will provide email notification to counsel of record listed below:

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