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15 Group of America, Inc. and Bentley Motors, Inc.

16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**  
18 **WESTERN DIVISION – LOS ANGELES**

19 SIGNAL IP, INC.,  
20 Plaintiff,  
21 v.  
22 VOLKSWAGEN GROUP OF  
23 AMERICA, INC., d/b/a. AUDI OF  
24 AMERICA, INC., and BENTLEY  
25 MOTORS, INC.,  
26 Defendants.

27 **Case No. CV 14-03113 JAK(JEMx)**

28 **DEFENDANTS' ANSWER TO  
PLAINTIFF'S FIRST AMENDED  
COMPLAINT**

**THE HONORABLE JOHN A.  
KRONSTADT**

**JURY TRIAL DEMANDED**

1 Defendants Volkswagen Group of America, Inc. and Bentley Motors, Inc.  
2 (“VWGoA” and “Bentley”) through their attorneys, answer the First Amended  
3 Complaint for Patent Infringement (D.E. 34, the “First Amended Complaint”) of  
4 plaintiff Signal IP, Inc. (“Signal”) as follows:  
5

6 **PARTIES**

7 1. Plaintiff Signal IP is a California corporation with its principal place of  
8 business at 11100 Santa Monica Blvd., Suite 380, Los Angeles, CA 90025.

9 **Response to Paragraph 1:**

10 Admitted.

11  
12 2. On information and belief, Defendant Volkswagen Group of America,  
13 Inc., d/b/a Audi of America, Inc. is a New Jersey corporation with its principal  
14 place of business at 2200 Ferdinand Porsche Drive, Herndon, VA 20171.

15 **Response to Paragraph 2:**

16 Admitted that Audi of America, Inc. is a registered trade name of  
17 Volkswagen Group of America, Inc., which is a New Jersey corporation having its  
18 principal place of business at 2200 Ferdinand Porsche Drive, Herndon, Virginia  
19 20171.

20  
21 3. On information and belief, Defendant Bentley Motors, Inc. is a  
22 Delaware corporation with its principal place of business at 2200 Ferdinand  
23 Porsche Drive, Herndon, VA 20171.

24 **Response to Paragraph 3:**

25 Admitted.  
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1 the expectation that the products and services will be purchased or used by  
2 customers in California and within this judicial district. Accordingly, Defendants  
3 have infringed Signal IP's patents within the State of California and in this judicial  
4 district as alleged in more detail below.

5 **Response to Paragraph 6:**

6 Denied.

7  
8 7. Venue is proper in this district under 28 U.S.C. §§ 1391 and 1400(b).

9 **Response to Paragraph 7:**

10 Denied.

11  
12 **BACKGROUND**

13 8. Signal IP, Inc. is a California corporation with a principal place of  
14 business at 11100 Santa Monica Blvd., Suite 380, Los Angeles, CA 90025. It is the  
15 owner of the entire right, title and interest in and to U.S. Patent Nos. 5,714,927;  
16 5,732,375; 5,954,775; 6,012,007; 6,434,486; and 6,775,601 (the "Patents-in-Suit"),  
17 including the right to recover for past, present and future infringement.

18 **Response to Paragraph 8:**

19 Admitted that plaintiff Signal IP, Inc. is a California corporation with a  
20 principal place of business at 11100 Santa Monica Blvd., Suite 380, Los Angeles,  
21 CA 90025; otherwise denied.

22  
23 9. On information and belief, Defendants are direct or indirect  
24 subsidiaries of global car manufacturer and distributor Volkswagen AG, which is  
25 headquartered in Germany. Volkswagen AG manufactures and distributes cars  
26 under brand names including "Audi", "Volkswagen", and "Bentley."  
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**Response to Paragraph 9:**

Admitted that VWGoA is a subsidiary of Volkswagen AG of Wolfsburg, Germany, that Bentley is a subsidiary of VWGoA, and that subsidiaries of Volkswagen AG manufacture and distribute Volkswagen, Audi, and Bentley brand vehicles; otherwise denied.

10. Defendants have knowledge of each of the Patents-in-Suit, and have had the specific knowledge that their products and services described below infringe the Patents-in-Suit, since at least the filing of the complaint in this action on April 23, 2014, which was served on Defendants on April 30, 2014. Signal IP gives and has given Defendants notice of its infringement of the Patents-in-Suit.

**Response to Paragraph 10:**

Admitted that Signal filed a Complaint for infringement of the Patents-in-Suit against VWGoA and Bentley on April 23, 2014, which was served on VWGoA and Bentley on April 30, 2014; otherwise denied.

11. Signal IP has also already served Defendants with its Asserted Claims and Infringement Contentions pursuant to Standing Patent Rule §§ 2.1 and 2.2 (the “Infringement Contentions”), on July 8, 2014. The Infringement Contentions provide Defendants with notice of each claim of each patent in suit that is infringing [sic], and separately for each asserted claim, identify each accused instrumentality [sic] in a manner that is as specific as is reasonably possible. The Infringement Contentions also identify specifically where each limitation of each asserted claim is found within each accused instrumentality, and identify the basis for Signal IP’s allegations of willful infringement. The Infringement Contentions set forth Signal IP’s allegations of infringement in this matter.

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