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15 *Attorneys for Defendant Cree, Inc.*

16 **IN THE UNITED STATES DISTRICT COURT**
17 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
18 **SOUTHERN DIVISION**

19 Document Security Systems, Inc.,
20 Plaintiff,
21 v.
22 Cree, Inc.,
23 Defendant.

24 Case No. 2:17-cv-04263-JVS-JCG
25 **DEFENDANT CREE, INC.’S**
26 **ANSWER TO FIRST**
27 **AMENDED COMPLAINT FOR**
PATENT INFRINGEMENT
DEMAND FOR JURY TRIAL

28 Defendant Cree, Inc. (“Cree”), by and through its undersigned attorneys
29 answers (by corresponding paragraphs) the First Amended Complaint For Patent
30 Infringement (“the First Amended Complaint”) filed by Document Security
31 Systems, Inc. (“DSS”) as follows:

32 **PARTIES**

33 1. Cree is without knowledge or information sufficient to form a belief
34 as to the truth or falsity of the allegations in Paragraph 1 of the First Amended
35 Complaint, and therefore denies the same.
36
37

1 19. Denied.

2 20. Cree admits that what purports to be a copy of the '771 Patent was
3 included as Exhibit A attached to the Complaint served on Cree. Cree denies the
4 remaining allegations in Paragraph 20.

5 21. Denied.

6 22. Denied.

7 23. Cree admits that the '771 Patent was cited by the USPTO examiner
8 during prosecution of U.S. Patent No. 8,860,943. Cree further admits that the
9 '771 Patent was cited by Cree during prosecution of U.S. Patent Nos. 8,866,166;
10 8,878,217; 9,111,778; and 9,123,874. Cree admits that what purports to be a
11 copy of the '771 Patent was included as Exhibit A attached to the Complaint
12 served on Cree in case 2:17-cv-309. Cree denies the remaining allegations in
13 Paragraph 23.

14 24. Denied.

15 **COUNT II**

16 **INFRINGEMENT OF THE '486 PATENT**

17 25. Cree repeats its denials and admissions corresponding to Paragraphs
18 1-24 above as if fully set forth herein.

19 26. Denied.

20 27. Denied.

21 28. Cree admits that XLamp XB-D LED products are sold and offered
22 for sale by Cree. Cree denies the remaining allegations in Paragraph 28.

23 29. Denied.

24 30. Denied.

25 31. Denied.

26 32. Denied.

27 33. Denied.

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