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9 *Attorneys for Defendant*
 10 *Lite-On, Inc.*

11
 12 **UNITED STATES DISTRICT COURT**
 13 **CENTRAL DISTRICT OF CALIFORNIA**

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 15 DOCUMENT SECURITY SYSTEMS,
 16 INC., a New York corporation,

17 Plaintiff,

18 vs.

19 LITE-ON, INC., a California corporation,
 20 and LITE-ON TECHNOLOGY
 CORPORATION, a Taiwanese
 21 corporation,

22 Defendants.

Case No. 2:17-cv-6050-JVS-JCG

**DEFENDANT LITE-ON, INC.'S
 ANSWER AND AFFIRMATIVE
 DEFENSES TO PLAINTIFF'S
 FIRST AMENDED COMPLAINT**

DEMAND FOR JURY TRIAL

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1 any acts of infringement in this District. Lite-On denies any and all remaining
2 allegations in Paragraph 7.

3 8. Paragraph 8 states legal conclusions to which no response is required.
4 Lite-On does not contest that venue is proper in the Central District of California as to
5 Lite-On for purposes of this action only under 28 U.S.C. §§ 1391 (b)-(c) and 1400(b).
6 Lite-On denies any and all remaining allegations in Paragraph 8.

7 **BACKGROUND**

8 9. Lite-On admits that United States Patent No. 6,949,771 (“the ’771
9 Patent”) is titled “Light Source,” and that what purports to be a copy of the ’771
10 Patent is attached to the FAC as Exhibit A. Lite-On further admits that the ’771
11 Patent, on its face, states that it was issued on September 27, 2005. Lite-On denies
12 that the ’771 Patent was duly and legally issued. Lite-On is without knowledge or
13 information sufficient to form a belief as to the truth of the remaining allegations in
14 Paragraph 9 and therefore denies them.

15 10. Lite-On admits that United States Patent No. 7,524,087 (“the ’087
16 Patent”) is titled “Optical Device,” and that what purports to be a copy of the ’087
17 Patent is attached to the FAC as Exhibit B. Lite-On further admits that the ’087
18 Patent, on its face, states that it was issued on April 28, 2009. Lite-On denies that the
19 ’087 Patent was duly and legally issued. Lite-On is without knowledge or information
20 sufficient to form a belief as to the truth of the remaining allegations in Paragraph 10
21 and therefore denies them.

22 11. Lite-On admits that United States Patent No. 7,256,486 (“the ’486
23 Patent”) is titled “Packing Device for Semiconductor Die, Semiconductor Device
24 Incorporating Same and Method of Making Same,” and that what purports to be a
25 copy of the ’486 Patent is attached to the FAC as Exhibit C. Lite-On further admits
26 that the ’486 Patent, on its face, states that it was issued on August 14, 2007. Lite-On
27 denies that the ’486 Patent was duly and legally issued. Lite-On is without knowledge
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1 or information sufficient to form a belief as to the truth of the remaining allegations in
2 Paragraph 11 and therefore denies them.

3 12. Lite-On is without knowledge or information sufficient to form a belief
4 as to the truth of the allegations contained in Paragraph 12 and therefore denies them.

5 **COUNT I**

6 **ALLEGED INFRINGEMENT OF THE '771 PATENT**

7 13. Lite-On incorporates by reference its responses to the allegations in
8 Paragraphs 1 through 12 above as if fully set forth herein.

9 14. Lite-On denies the allegations in Paragraph 14.

10 15. Lite-On denies the allegations in Paragraph 15.

11 16. Lite-On denies the allegations in Paragraph 16.

12 17. Lite-On denies the allegations in Paragraph 17.

13 18. Lite-On denies the allegations in Paragraph 18.

14 19. Lite-On denies the allegations in Paragraph 19.

15 20. Lite-On denies the allegations in Paragraph 20.

16 21. The allegations of Paragraph 21 have been dismissed (Dkt. No. 49), and a
17 response is therefore not required. Plaintiff is obligated to amend its complaint to
18 remove these dismissed allegations, and Lite-On reserves all rights and remedies in
19 this regard. In any event, Lite-On denies the allegations in Paragraph 21.

20 22. Lite-On denies the allegations in Paragraph 22.

21 **COUNT II**

22 **ALLEGED INFRINGEMENT OF THE '087 PATENT**

23 23. Lite-On incorporates by reference its responses to the allegations in
24 Paragraphs 1 through 22 above as if fully set forth herein. Lite-On denies any and all
25 remaining allegations in Paragraph 23.

26 24. Lite-On denies the allegations in Paragraph 24.

27 25. Lite-On denies the allegations in Paragraph 25.

28 26. Lite-On denies the allegations in Paragraph 26.

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