

Exhibit B

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Garmin Ltd.*

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

| | | |
|---------------------------------------|---|----------------------------------|
| Philips North America, LLC, |) | Case No. 2:19-cv-06301-AB (KSx) |
| |) | |
| Plaintiff, |) | [PROPOSED] DEFENDANT |
| |) | GARMIN LTD.’S FIRST |
| v. |) | AMENDED ANSWER TO |
| |) | PHILIPS’ FAC, AFFIRMATIVE |
| |) | DEFENSES, AND |
| Garmin International, Inc. and Garmin |) | COUNTERCLAIMS |
| Ltd. |) | |
| |) | |
| Defendants. |) | |
| |) | |

Pursuant to Federal Rule of Civil Procedure (“Rule”) 8(b), Defendant Garmin Ltd. answers Plaintiff’s (“Philips”) First Amended Complaint (“FAC”), Dkt. No. 45. Garmin Ltd. objects that the great bulk of Philips’ FAC violates Rules 8(a) and

1 10(b). Garmin Ltd. has made a good faith attempt to answer the factual allegations
2 in Philips' FAC but herein objects that a great number of paragraphs are not "limited
3 as far as practicable to a single set of circumstances". Fed.R.Civ.P 10(b).

4
5 **NATURE OF THE ACTION**

6 1. Garmin Ltd. admits that Plaintiff Philips North America, LLC
7 ("Philips") brings this action. Garmin Ltd. denies the remainder of the allegations in
8 this paragraph.

9 2. Garmin Ltd. admits that Philips is a subsidiary of Koninklijke Philips
10 N.V. Gamin Ltd. lacks knowledge or information sufficient to form a belief about
11 the truth of the remaining allegations in this paragraph and therefore denies same.

12 3. Garmin Ltd. lacks knowledge or information sufficient to form a belief
13 about the truth of the allegations in this paragraph and therefore denies same.

14 4. Garmin Ltd. lacks knowledge or information sufficient to form a belief
15 about the truth of the allegations in this paragraph and therefore denies same.

16 5. Garmin Ltd. lacks knowledge or information sufficient to form a belief
17 about the truth of the allegations in this paragraph and therefore denies same.

18 6. Garmin Ltd. lacks knowledge or information sufficient to form a belief
19 about the truth of the allegations in this paragraph and therefore denies same.

20 7. Garmin Ltd. lacks knowledge or information sufficient to form a belief
21 about the truth of the allegations in this paragraph and therefore denies same.

22 8. Garmin Ltd. lacks knowledge or information sufficient to form a belief
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1 about the truth of the allegations in this paragraph and therefore denies same.

2 9. Garmin Ltd. admits that a predecessor Garmin entity was founded in
3 1989 as ProNav, Inc. and that it offered devices for navigation, including GPS-based
4 products. Garmin Ltd denies the remaining allegations in this paragraph.

5 10. Admit that Philips has tried to persuade Garmin Ltd. to take a license to
6 some of its patents since 2016. Denied as to the remaining allegations in this
7 paragraph.

8 PARTIES

9 11. Garmin Ltd. admits that the Patents-in-Suit relate, in the most general
10 sense, to GPS/audio athletic training, security mechanisms for transmission of
11 personal data, connected wearable/online products, and [the] handling of interrupted
12 connections, and that Philips is a Delaware LLC. Garmin Ltd. denies that the
13 Patents-in-Suit contain “innovations”. As to the remaining allegations in this
14 paragraph, Garmin Ltd. lacks knowledge or information sufficient to form a belief
15 about the truth of the allegations in this paragraph and therefore denies same.

16 12. Admitted.

17 13. Admitted.

18 14. Admitted except as to “infringements,” which is denied.

19 15. Admitted.

20 16. Denied as to Garmin Ltd except that Garmin Ltd. admits that it has not
21 taken a license to the Patents-in-Suit.

22 JURISDICTION AND VENUE

23 17. Garmin Ltd. admits that this is an action under the patent laws. Garmin
24 Ltd. admits that subject matter jurisdiction is proper in this District. Garmin Ltd.
25 denies the remaining allegations in this paragraph.

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18. Denied.¹

19. Admit that Garmin International maintains an engineering facility at said address. Remaining facts are denied.

20. Admit that Garmin International maintains an engineering facility at said address. Remaining facts are denied.

21. Denied.

22. Denied.

23. Denied.

24. Denied.

25. Denied.

26. Admitted.

27. Denied.

28. Denied.

29. Denied.

30. Admitted.

31. Denied.

32. Denied.

33. Denied.

34. Admitted.

35. Denied.

36. Denied.

FACTUAL BACKGROUND

Philips Background and Innovation Leadership

37. Garmin Ltd. lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph and therefore denies same.

¹ Philips uses “Garmin” without designating the entity addressed. Throughout, Garmin Ltd. will answer only as to itself, and as if “Garmin” means Garmin Ltd.

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