

SONY CORPORATION, SONY CORPORATION OF AMERICA, SONY ELECTRONICS INC., SONY MOBILE COMMUNICATIONS AB, AND SONY MOBILE COMMUNICATIONS (USA) INC.,

Defendants.

DEFENDANTS SONY CORPORATION, SONY CORPORATION OF AMERICA, SONY ELECTRONICS INC., SONY MOBILE COMMUNICATIONS AB, AND SONY MOBILE COMMUNICATIONS (USA), INC.'S ANSWER TO PLAINTIFF HUMANEYES TECHNOLOGIES, LTD.'S FIRST AMENDED COMPLAINT

Defendants Sony Corporation (“SC”), Sony Corporation of America (“SCA”), Sony Electronics Inc. (“SEL”), Sony Mobile Communications AB (“SoMC”), and Sony Mobile Communications (USA), Inc. (“SoMC USA”) (collectively “Defendants” or “Sony”) hereby answer Plaintiff HumanEyes Technologies, Ltd.’s (“Plaintiff or HumanEyes”) First Amended Complaint (“First Amended Complaint”) as follows. Any allegation that is admitted below applies only to the Sony entity making the admission and to no other Sony entities. Except as expressly admitted herein, Defendants deny each and every allegation contained in Plaintiff’s First Amended Complaint.

PARTIES

1. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 1 of the First Amended Complaint, and

corporation with a principal place of business at 550 Madison Avenue, New York, NY 10022-3211. SCA further admits that it is registered to do business in Delaware and that its registered agent for service of process in Delaware is The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801.

4. SEL admits that it is a wholly-owned subsidiary of SCA and an indirect subsidiary of SC. SEL further admits that it is a Delaware corporation with a principal place of business at 16530 Via Esprillo, San Diego, CA 92127. SEL admits that its registered agent for service of process is Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808.

5. SoMC admits that it is a subsidiary of SC, and that it is a Swedish corporation. SoMC denies any remaining allegations of paragraph 5 of the First Amended Complaint.

6. SoMC USA admits that it is an indirect subsidiary of SC, and that it is a Delaware Corporation with its principal place of business at 3333 Piedmont Road, Suite 600, Atlanta, Georgia 3035. SoMC USA further admits that its registered agent for service of process is Capitol Services, Inc., 1675 South State Street, Suite B, Dover, DE 19901.

7. SC admits that SC or one or more of its subsidiaries and/or contract manufacturers design, manufacture, import and sell cameras and mobile phones. SEL admits that it imports cameras and that it sells in the United States certain cameras and mobile phones manufactured abroad. SoMC admits that SoMC or one or more of its subsidiaries and/or

8. Defendants admit that the First Amended Complaint purports to state an action under the patent laws of the United States, 35 U.S.C. § 100, *et seq.*, including 35 U.S.C. § 271. Defendants admit that this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

9. For the purposes of this case only, SC does not contest that this Court has personal jurisdiction over SC. SC denies the remaining allegations of paragraph 9 of the First Amended Complaint.

10. For the purposes of this case only, SC does not contest that this Court has personal jurisdiction over SC. SC denies the remaining allegations of paragraph 10 of the First Amended Complaint.

11. For the purposes of this case only, SCA does not contest that this Court has personal jurisdiction over SCA. SCA denies the remaining allegations of paragraph 11 of the First Amended Complaint.

12. For the purposes of this case only, SCA does not contest that this Court has personal jurisdiction over SCA. SCA denies the remaining allegations of paragraph 12 of the First Amended Complaint.

13. SEL does not contest that this Court has personal jurisdiction over SEL.

14. For the purposes of this case only, SoMC does not contest that this Court has personal jurisdiction over SoMC. SoMC denies the remaining allegations of paragraph 14 of the

16. SoMC USA does not contest that this Court has personal jurisdiction over SoMC USA.
17. Defendants admit that venue is proper in this District under 28 U.S.C. §§ 1391(b) and (c) and/or 1400(b).

BACKGROUND AS TO ALL COUNTS

18. Sony admits that Shmuel Peleg is listed as an inventor on the face of U.S. Patent No. 6,665,003 (“the ’003 patent”) and on the face of U.S. Patent No. 7,477,284 (“the ’284 patent”). Sony is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 18 of the First Amended Complaint, and therefore denies them.
19. Sony is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 19 of the First Amended Complaint, and therefore denies them.
20. Sony is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 20 of the First Amended Complaint, and therefore denies them.
21. SC admits that Dr. Kenji Tanaka has cited articles listing Shmuel Peleg as an author in three of his publications, and that articles attributed to Shmuel Peleg or patents in which Shmuel Peleg is listed as an inventor are referenced in U.S. Patent Nos. 7,542,606;

allegations of paragraph 21 of the First Amended Complaint.

22. Sony denies that Shmuel Peleg or others at HumanEyes discussed any “breakthrough work on 3D panorama mosaic imaging” with any Sony employee. SC admits that Shmuel Peleg contacted Dr. Tanaka, and that individuals associated with HumanEyes and/or Snapily initiated contact with SC in 2010. SCA admits that individuals associated with HumanEyes and/or Snapily contacted SCA. Sony is without knowledge or information sufficient to form a belief as to the truth of the allegations concerning Mary Abram, and therefore denies them. Sony denies any remaining allegations of paragraph 22 of the First Amended Complaint.

THE ASSERTED PATENTS

23. Sony admits that the '003 patent states on its face that its title is “System and Method for Generating and Displaying Panoramic Images and Movies.” Sony also admits that the '003 patent states on its face that it issued on December 16, 2003, and names as inventors Shmuel Peleg, Moshe Ben-Ezra, and Robert S. Rosenschein. Sony admits that a document purporting to be the '003 patent was attached as Exhibit A to the First Amended Complaint. Sony is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 23 of the First Amended Complaint, and therefore denies them.

24. Sony admits that the '284 patent states on its face that its title is “System and

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