

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROBERT BOSCH LLC,)	
)	
Plaintiff,)	
)	C.A. No. 12-574-LPS
v.)	
)	JURY TRIAL DEMANDED
ALBEREE PRODUCTS, INC., API KOREA CO., LTD., and SAVER AUTOMOTIVE PRODUCTS, INC.,)	
)	
)	
Defendants.)	

**DEFENDANT SAVER AUTOMOTIVE PRODUCTS, INC.’S ANSWER
TO ROBERT BOSCH, LLC’S AMENDED COMPLAINT**

Defendant Saver Automotive Products, Inc. (hereinafter “Saver”), by and through its attorneys, hereby answers Robert Bosch, LLC’s Amended Complaint (“Complaint”) as follows:¹

1. Saver admits that the Complaint alleges and seeks judgment under the patent laws of the United States, Title 35 of the United States Code (for example, §§ 271, 281, 283, 284 and 285) and alleges jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a). Saver denies the remaining allegations in paragraph 1.

¹ Saver files its responsive pleading to the Complaint notwithstanding its motion to dismiss for lack of personal jurisdiction is presently pending before the Court. Pursuant to rulings made by the Court at the Case Management Conference held on August 4, 2014, the Court’s Oral Order of August 21, 2014 [C.A. No. 12-574 D.I. 56], and Federal Rule of Civil Procedure 13(a), Saver files its Answer, Affirmative Defenses and Counterclaims to Robert Bosch LLC’s Complaint on condition the Court denies Saver’s motion to dismiss. Pursuant to rulings made by the Court at the Case Management Conference held on August 4, 2014, nothing stated in Saver’s Answer, Affirmative Defenses and Counterclaims to Robert Bosch LLC’s Complaint shall be construed as Saver’s acquiescence to the jurisdiction of the Court, or an admission that venue is proper, or waiver or withdrawal of its motion to dismiss.

DEFENDANTS AND ACCUSED PRODUCTS

2. Saver lacks sufficient information to confirm or deny the allegations of paragraph 2 and accordingly denies the same.
3. Saver lacks sufficient information to confirm or deny the allegations of paragraph 3 and accordingly denies the same.
4. Saver admits the allegations of paragraph 4 of the complaint.
5. Saver lacks sufficient information to confirm or deny the allegations of paragraph 5 and accordingly denies the same.
6. Saver lacks sufficient information to confirm or deny the allegations of paragraph 6 and accordingly denies the same.
7. Saver lacks sufficient information to confirm or deny the allegations of paragraph 7 and accordingly denies the same.
8. Saver lacks sufficient information to confirm or deny the allegations of paragraph 8 and accordingly denies the same.
9. Saver lacks sufficient information to confirm or deny the allegations of paragraph 9 and accordingly denies the same.
10. Saver lacks sufficient information to confirm or deny the allegations of paragraph 10 and accordingly denies the same.
11. Saver lacks sufficient information to confirm or deny the allegations of paragraph 11 and accordingly denies the same.
12. Saver lacks sufficient information to confirm or deny the allegations of paragraph 12 and accordingly denies the same.
13. Saver lacks sufficient information to confirm or deny the allegations of

paragraph 13 and accordingly denies the same.

14. Saver lacks sufficient information to confirm or deny the allegations of paragraph 14 and accordingly denies the same.

15. Saver denies the allegations of paragraph 15 of the complaint.

16. Saver denies the allegations of paragraph 16 of the complaint.

17. Saver denies the allegations of paragraph 17 of the complaint.

18. Saver lacks sufficient information to confirm or deny the allegations of paragraph 18 and accordingly denies the same.

19. Saver lacks sufficient information to confirm or deny the allegations of paragraph 19 and accordingly denies the same.

COUNT ONE – INFRINGEMENT OF U.S. PATENT NO. 6,523,218

20. The statements and denials of paragraphs 2 through 19 of this Answer are incorporated by reference as if set forth herein.

21. Saver admits a copy of the `218 patent was attached as Exhibit A to the Amended Complaint. Saver admits that, on its face, the `218 patent lists an issue date of February 25, 2003. Saver denies that the `218 patent was duly and legally issued. Saver lacks sufficient information to confirm or deny the remaining allegations of paragraph 21 and accordingly denies the same.

22. Saver lacks sufficient information to confirm or deny the allegations of paragraph 22 and accordingly denies the same.

23. Saver denies the allegations of paragraph 23 of the complaint.

24. Saver lacks sufficient information to confirm or deny the allegations of paragraph 24 and accordingly denies the same.

25. Saver lacks sufficient information to confirm or deny the allegations of paragraph 25 and accordingly denies the same.

26. Saver lacks sufficient information to confirm or deny the allegations of paragraph 26 and accordingly denies the same.

27. Saver denies the allegations of paragraph 27 of the complaint.

28. Saver denies the allegations of paragraph 28 of the complaint.

29. Saver lacks sufficient information to confirm or deny the allegations of paragraph 29 and accordingly denies the same.

30. Saver denies the allegations of paragraph 30 of the complaint.

31. Saver denies the allegations of paragraph 31 of the complaint.

32. Saver admits the allegations of paragraph 32 of the complaint.

33. Saver denies the allegations of paragraph 33 of the complaint.

34. Saver lacks sufficient information to confirm or deny the allegations of paragraph 34 and accordingly denies the same.

35. Saver admits counsel for Saver received letters from counsel for plaintiff dated October 11, 2011 and January 15, 2013. Saver denies plaintiff's characterization of the contents of the letters. Saver denies the remaining allegations of paragraph 35.

36. Saver denies the allegations of paragraph 36 of the complaint.

37. Saver denies the allegations of paragraph 37 of the complaint

38. Saver denies the allegations of paragraph 38 of the complaint

39. Saver denies the allegations of paragraph 39 of the complaint

40. Saver denies the allegations of paragraph 40 of the complaint

41. Saver denies the allegations of paragraph 41 of the complaint

42. Saver denies the allegations of paragraph 42 of the complaint

43. Saver denies the allegations of paragraph 43 of the complaint

44. Saver denies the allegations of paragraph 44 of the complaint

45. Saver denies the allegations of paragraph 45 of the complaint

COUNT TWO – INFRINGEMENT OF U.S. PATENT NO. 6,530,111

46. The statements and denials of paragraphs 2 through 19 of this Answer are incorporated by reference as if set forth herein.

47. Saver admits a copy of the '111 patent was attached as Exhibit B to the Amended Complaint. Saver admits that, on its face, the '111 patent lists an issue date of March 11, 2003. Saver denies that the '111 patent was duly and legally issued. Saver lacks sufficient information to confirm or deny the remaining allegations of paragraph 47 and accordingly denies the same.

48. Saver lacks sufficient information to confirm or deny the allegations of paragraph 48 and accordingly denies the same.

49. Saver lacks sufficient information to confirm or deny the allegations of paragraph 49 and accordingly denies the same.

50. Saver denies the allegations of paragraph 50 of the complaint.

51. Saver denies the allegations of paragraph 51 of the complaint.

52. Saver denies the allegations of paragraph 52 of the complaint.

53. Saver denies the allegations of paragraph 53 of the complaint.

54. Saver admits counsel for Saver received letters from counsel for plaintiff dated October 11, 2011 and January 15, 2013. Saver denies plaintiff's characterization of the contents of the letters. Saver denies the remaining allegations of paragraph 54.

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