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

| | | |
|---|---|---|
| ARENDI S.A.R.L., | ) | |
| | ) | |
| Plaintiff, | ) | |
| | ) | C.A. No. 13-919-LPS |
| v. | ) | |
| | ) | **JURY TRIAL DEMANDED** |
| GOOGLE LLC, | ) | |
| | ) | |
| Defendant. | ) | |

**DEFENDANT GOOGLE LLC'S ANSWER TO PLAINTIFF'S AMENDED COMPLAINT**

Defendant Google LLC ("Google"), by and through the undersigned counsel, answers the

Amended Complaint of Plaintiff Arendi S.A.R.L. ("Arendi") as follows:

**RELATED ACTIONS**

1.       Google lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in paragraph 1, and therefore denies them.

**THE PARTIES AND ACCUSED PRODUCTS**

2.       Google lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in paragraph 2, and therefore denies them.

3.       Google admits that Google LLC is a Delaware corporation with its principal place of

business in Mountain View, California. Google denies any remaining allegations in paragraph 3.

4.       Google admits that it transacts business in this judicial district.

5.       Google admits that it makes, uses, imports, offers to sell, or sells (and/or has made, used,

imported, offered to sell, or sold) Gmail, Google Documents/Docs, Google Sheets, Google

Slides, Google Chrome, Google Translate, Google Calendar, Google Hangouts, the Google App,

Nexus, Pixel, Chromebook Pixel, and Pixelbook. Google denies any remaining allegations in

paragraph 5.

## NATURE OF THE ACTION

6.      Google admits that the Amended Complaint purports to state a claim arising under the patent laws of the United States, Title 35 of the U.S. Code. Google denies any remaining allegations in paragraph 6.

## JURISDICTION AND VENUE

7.      Google admits that this Court has subject-matter jurisdiction over this case.

8.      For the purposes of this matter, Google does not contest personal jurisdiction in this District. Google denies that it has committed any acts of infringement within this or any other district and denies any remaining allegations in paragraph 8.

9.      Google admits that venue is proper in this District. Google denies that it has committed any acts of infringement within this or any other district and denies any remaining allegations in paragraph 9.

## THE PATENTS-IN-SUIT

10.      Google admits that U.S. Patent No. 7,917,843 (the "'843 patent") is titled "Method, System and Computer Readable Medium for Addressing Handling from a Computer Program." Google admits that Exhibit A appears to be a copy of the '843 patent, but lacks sufficient information to verify its authenticity. Google denies that the '843 patent was duly and legally issued. Google lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 10, and therefore denies them.

11.      Google admits that U.S. Patent No. 7,496,854 (the "'854 patent") is titled "Method, System and Computer Readable Medium for Addressing Handling from a Computer Program." Google admits that Exhibit B appears to be a copy of the '854 patent, but lacks sufficient information to verify its authenticity. Google denies that the '854 patent was duly and legally

issued. Google lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 11, and therefore denies them.

12.     Google admits that U.S. Patent No. 7,921,356 (the "'356 patent") is titled "Method, System and Computer Readable Medium for Addressing Handling from a Computer Program." Google admits that Exhibit C appears to be a copy of the '356 patent, but lacks sufficient information to verify its authenticity. Google denies that the '356 patent was duly and legally issued. Google lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 12, and therefore denies them.

13.     Google admits that U.S. Patent No. 8,306,993 (the "'993 patent") is titled "Method, System and Computer Readable Medium for Addressing Handling from an Operating System." Google admits that Exhibit D appears to be a copy of the '993 patent, but lacks sufficient information to verify its authenticity. Google denies that the '993 patent was duly and legally issued. Google lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 13, and therefore denies them.

14.     Google lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 14, and therefore denies them.

15.     Google denies each and every allegation in paragraph 15.

### BACKGROUND

16.     Google lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 16, and therefore denies them.

17.     Google lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 17, and therefore denies them.

## COUNT I

### (Infringement of United States Patent No. 7,917,843)

18.     Google repeats and realleges its answers to the preceding paragraphs as if fully set forth here.

19.     Google denies each and every allegation in paragraph 19.

20.     Google denies each and every allegation in paragraph 20.

21.     Google denies each and every allegation in paragraph 21.

22.     Google admits that it has been aware of the '843 patent as of the service of the original Complaint.  Google denies the remaining allegations of paragraph 22.

23.     Google denies each and every allegation in paragraph 23.

24.     Google denies each and every allegation in paragraph 24.

25.     Google denies each and every allegation in paragraph 25.

26.     Google denies each and every allegation in paragraph 26.

27.     Google denies each and every allegation in paragraph 27.

## COUNT II

### (Infringement of United States Patent No. 7,496,854)

28.     Google repeats and realleges its answers to the preceding paragraphs as if fully set forth here.

29.     Google denies each and every allegation in paragraph 29.

30.     Google denies each and every allegation in paragraph 30.

31.     Google denies each and every allegation in paragraph 31.

32.     Google admits that it has been aware of the '854 patent as of the service of the original Complaint.  Google denies the remaining allegations of paragraph 32.

33.     Google denies each and every allegation in paragraph 33.

34.     Google denies each and every allegation in paragraph 34.

35.     Google denies each and every allegation in paragraph 35.

36.     Google denies each and every allegation in paragraph 36.

37.     Google denies each and every allegation in paragraph 37.

## COUNT III

### (Infringement of United States Patent No. 7,921,356)

38.     Google repeats and realleges its answers to the preceding paragraphs as if fully set forth

here.

39.     Google denies each and every allegation in paragraph 39.

40.     Google denies each and every allegation in paragraph 40.

41.     Google denies each and every allegation in paragraph 41.

42.     Google admits that it has been aware of the '356 patent as of the service of the original

Complaint.  Google denies the remaining allegations of paragraph 42.

43.     Google denies each and every allegation in paragraph 43.

44.     Google denies each and every allegation in paragraph 44.

45.     Google denies each and every allegation in paragraph 45.

46.     Google denies each and every allegation in paragraph 46.

47.     Google denies each and every allegation in paragraph 47.

## COUNT IV

### (Infringement of United States Patent No. 8,306,993)

48.     Google repeats and realleges its answers to the preceding paragraphs as if fully set forth

here.

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