

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

SIPCO, LLC and IP CO., LLC <i>d/b/a</i> INTUS IQ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 16-830-RGA
	)	
STREETLINE, INC., KAPSCH TRAFFICCOM HOLDING CORP., and KAPSCH TRAFFICCOM U.S. CORP.	)	
	)	
Defendants.	)	
	)	

**ANSWER AND COUNTERCLAIMS TO  
SECOND AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

Defendant Streetline, Inc. (“Streetline”) hereby responds to SIPCO, LLC’s (“SIPCO”) and IP Co., LLC’s (“IPCO”) (collectively, “Plaintiffs”) Second Amended Complaint for Patent Infringement (“Second Amended Complaint”). Streetline denies each and every allegation contained in the Complaint that is not expressly admitted below. Any factual allegation below is admitted only as to the specific admitted facts, not as to any purported conclusions, characterizations, implications or speculations that arguably follow from the admitted facts. Streetline denies that Plaintiffs are entitled to the relief requested or any other relief.

**PARTIES**

1. Streetline is without knowledge or information to admit or deny the allegations in Paragraph 1 and therefore denies them.
2. Streetline is without knowledge or information to admit or deny the allegations in Paragraph 2 and therefore denies them.

3. Streetline admits that it is a corporation organized under the laws of Delaware, with its principal place of business located at 1200 Park Place, San Mateo, CA 94403. Streetline admits that its registered agent is Incorporating Services, Ltd., 3600 S. Dupont Highway, Dover, DE 19901. Except as so admitted, denied.

4. Streetline is without knowledge or information to admit or deny the allegations in Paragraph 4 and therefore denies them.

5. Streetline admits that Kapsch TrafficCom Holding Corp acquired Streetline in April 2015 and that Streetline is a wholly-owned subsidiary of Kapsch TrafficCom Holding Corp. Except as so admitted, denied.

6. Streetline is without knowledge or information to admit or deny the allegations in Paragraph 6 and therefore denies them.

7. Streetline is without knowledge or information to admit or deny the allegations in Paragraph 7 and therefore denies them.

#### **JURISDICTION AND VENUE**

8. Streetline admits that this Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a). Except as so admitted, denied.

9. Streetline admits that this Court has personal jurisdiction over Streetline. Except as so admitted, denied.

10. Streetline admits, for the purposes of this action only, that venue is proper in this District. Except as so admitted, denied.

#### **PLAINTIFFS**

11. Streetline is without knowledge or information to admit or deny the allegations in Paragraph 11 and therefore denies them.

12. Streetline is without knowledge or information to admit or deny the allegations in Paragraph 12 and therefore denies them.

13. Streetline is without knowledge or information to admit or deny the allegations in Paragraph 13 and therefore denies them.

14. Streetline is without knowledge or information to admit or deny the allegations in Paragraph 14 and therefore denies them.

15. Streetline is without knowledge or information to admit or deny the allegations in Paragraph 15 and therefore denies them.

16. Streetline is without knowledge or information to admit or deny the allegations in Paragraph 16 and therefore denies them.

**DEFENDANTS**

17. Streetline admits that it provides a parking management solution. Except as so admitted, denied.

18. Streetline admits that it provides a parking management solution, which is described on Streetline's website. Except as so admitted, denied.

19. Streetline admits that its parking management solution uses products supplied by Dust Networks group of Linear Technology Corporation, which on information and belief, was acquired by Analog Devices. Streetline is without knowledge or information to admit or deny the allegations of paragraph 19 and therefore denies them.

20. Streetline admits that it provides solutions named Parker, ParkerMap, ParkEdge, Enforcement, ParkSight, and ParkingData, which are described on Streetline's website. Except as so admitted, denied.

21. Streetline is without knowledge or information to admit or deny the allegations in Paragraph 21 and therefore denies them.

22. On February 7, 2018, the Court dismissed Plaintiffs' claims against Kapsch TrafficCom Holding Corp. and Kapsch TrafficCom U.S. Corp. (collectively, "Kapsch"). Thus, no response is required. To the extent a response is required, Streetline is without knowledge or information to admit or deny the allegations in Paragraph 21 and therefore denies them.

23. Streetline admits that Paragraph 23 purports to show a screen shot of Kapsch's website. Except as so admitted, denied.

24. Streetline admits that Paragraph 24 purports to quote from Kapsch's website. Except as so admitted, denied.

25. Streetline is without knowledge or information to admit or deny the allegations in Paragraph 25 and therefore denies them.

26. The allegations of Paragraph 26 call for a legal conclusion to which no response is required, and on that basis, they are denied.

**COUNT I**  
**INFRINGEMENT OF U.S. PATENT NO. 8,908,842**

27. Streetline incorporates by reference, as if set forth in full herein, its answers to Paragraphs 1 through 26 above.

28. Streetline admits that the title of U.S. Patent No. 8,908,842 ("the '842 Patent") is "Multi-Functional General Purpose Transceivers and Devices" and that Plaintiffs attached what purports to be a copy of the '842 Patent as Exhibit 1 to the Second Amended Complaint. Streetline is without knowledge or information to admit or deny the remaining allegations of Paragraph 28 and therefore denies them.

29. Denied.

30. The allegations in Paragraph 30 call for a legal conclusion to which no response is required, and on that basis, they are denied.

31. On February 7, 2018, the Court dismissed Plaintiffs' claims against Kapsch. Thus, no response is required. To the extent a response is required, denied.

32. Denied.

**COUNT II**  
**INFRINGEMENT OF U.S. PATENT NO. 8,625,496**

33. Streetline incorporates by reference, as if set forth in full herein, its answers to Paragraphs 1 through 26 above.

34. Streetline admits that the title of U.S. Patent No. 8,625,496 ("the '496 Patent") is "Wireless Network System and Method for Providing Same" and that Plaintiffs attached what purports to be a copy of the '496 Patent as Exhibit 2 to the Second Amended Complaint. Streetline is without knowledge or information to admit or deny the remaining allegations of Paragraph 34 and therefore denies them.

35. Denied.

36. The allegations of Paragraph 36 call for a legal conclusion to which no response is required, and on that basis, they are denied.

37. Denied.

38. The allegations of Paragraph 38 call for a legal conclusion to which no response is required, and on that basis, they are denied.

39. On February 7, 2018, the Court dismissed Plaintiffs' allegations of induced infringement against Streetline. Thus, no response is required. To the extent a response is required, denied.

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