

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

SIPCO LLC, and
IP CO., LLC (d/b/a INTUS IQ)

Plaintiffs,

v.

EMERSON ELECTRIC CO., FISHER-
ROSEMOUNT SYSTEMS, INC., and
ROSEMOUNT INC.,

Defendants.

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Civil Action No. 6:15-CV-907-JRG-KNM

**EMERSON ELECTRIC CO., FISHER-ROSEMOUNT SYSTEMS, INC., AND
ROSEMOUNT INC.'S ANSWER**

Defendants Emerson Electric Co., Fisher-Rosemount Systems, Inc., and Rosemount Inc., (collectively, "Defendants"), answer the Counterclaims of Plaintiffs SIPCO, LLC ("SIPCO") and IP CO, LLC (d/b/a/INTUS IQ) ("IP CO") (collectively, "Plaintiffs"), as follows in the correspondingly numbered paragraphs:

1. Admitted.
2. Admitted.
3. Defendants admit that Emerson Electric Co. is a corporation organized and existing under the laws of the State of Missouri and deny the remaining allegations of this Paragraph.
4. Admitted.
5. Admitted.

6. Admitted that, in general, claims for patent infringement arise under the cited statutes; denied that the Complaint actually asserts a claim for patent infringement under the cited statutes.

7. Admitted.

8. Denied.

9. Denied.

10. Denied.

11. Admitted.

12. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore deny them.

13. Defendants admit knowledge of the '492 patent before the filing of the Complaint and deny the remaining allegations of this Paragraph.

14. Denied.

15. Admitted.

16. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore deny them.

17. Defendants admit knowledge of the '692 patent before the filing of the Complaint and deny the remaining allegations of this Paragraph.

18. Denied.

19. Admitted.

20. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore deny them.

21. Defendants admit knowledge of the existence of the '893 patent before the filing of the Complaint and deny the remaining allegations of this Paragraph.

22. Denied.

23. Admitted.

24. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore deny them.

25. Defendants admit knowledge of the existence of the '516 patent before the filing of the Complaint and deny the remaining allegations of this Paragraph.

26. Denied.

27. Admitted.

28. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore deny them.

29. Defendants admit knowledge of the '661 patent before the filing of the Complaint and deny the remaining allegations of this Paragraph.

30. Denied.

31. Admitted.

32. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore deny them.

33. Defendants admit knowledge of the '314 patent before the filing of the Complaint and deny the remaining allegations of this Paragraph.

34. Denied.

35. Admitted.

36. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore deny them.

37. Defendants admit knowledge of the existence of the '471 patent and deny the remaining allegations of this Paragraph.

38. Denied.

39. Admitted.

40. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore deny them.

41. Defendants admit knowledge of the existence of the '496 patent and deny the remaining allegations of this Paragraph.

42. Denied.

43. Admitted.

44. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore deny them.

45. Defendants admit knowledge of the existence of the '780 patent and deny the remaining allegations of this Paragraph.

46. Denied.

47. Admitted.

48. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore deny them.

49. Denied.

50. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore deny them.

51. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore deny them.

52. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore deny them.

53. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore deny them.

54. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore deny them.

55. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore deny them.

56. Defendants admit that they sell and offer for sale products under the brand name “Smart Wireless Solutions.” Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of this Paragraph, and therefore deny them.

57. Defendants admit that they sell and offer for sale products under the brand name “Smart Wireless Solutions” and that the branded products may include gateways, devices,

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