IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNILOC 2017 LLC,	)
	)
Plaintiff,	)
	)
v.	) Civil Action No. 1:19-cv-11276
	)
AKAMAI TECHNOLOGIES, INC.,	)
	)
Defendant.	)

**AKAMAI TECHNOLOGIES, INC.'S ANSWER TO COMPLAINT
AND COUNTERCLAIMS**

Defendant Akamai Technologies, Inc. ("Akamai") answers the Complaint of Plaintiff

Uniloc 2017 LLC ("Uniloc") as set forth below. To the extent not specifically admitted, Akamai

denies the allegations in the Complaint.

THE PARTIES[1]

1.   Akamai currently lacks knowledge or information sufficient to form a belief as to

the truth of the allegations of paragraph 1, and therefore denies them.

2.   Akamai admits that it is a corporation duly organized and existing under the laws

of Delaware and that it has a principal place of business in Cambridge, Massachusetts.

JURISDICTION

3.   Akamai admits that the Complaint purports to bring an action for patent

infringement, but denies that it has committed any acts of infringement, pursuant to 35 U.S.C.

§ 271 or otherwise. The remaining allegations set forth in paragraph 3 of the Complaint contain

conclusions of law to which no response is required. To the extent a response is deemed to be

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[1] For ease of reference, Akamai uses the headings used in Uniloc's Complaint. In so doing,
Akamai does not admit any of the allegations contained in those headings. In addition, Akamai's
responses to Uniloc's allegations correspond to the numbered paragraphs in the Complaint.

required, Akamai admits that this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

COUNT I

4.   Akamai re-asserts and incorporates herein its responses to paragraphs 1-3 above, as though fully set forth herein.

5.   Akamai admits that U.S. Patent No. 6,324,578 ("the '578 patent") recites on its face that its title is "METHODS, SYSTEMS AND COMPUTER PROGRAM PRODUCTS FOR MANAGEMENT OF CONFIGURABLE APPLICATION PROGRAMS ON A NETWORK" and that it recites an issue date of November 27, 2001. Akamai admits that Exhibit A of the Complaint purports to be an uncertified copy of the '578 patent. Akamai denies that the '578 patent is a valid or properly issued patent. Akamai currently lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 5, and therefore denies them.

6.   Akamai admits that it operates a Content Delivery Network ("CDN"). Akamai admits that it operated the Luna Control Center and that the image in paragraph 6 of the Complaint purports to be a screenshot of the Luna Control Center. Akamai denies the remaining allegations set forth in paragraph 6 of the Complaint.

7.   Akamai admits that if a user did not enter the appropriate log-in credentials for Akamai's Luna Control Center, the user would not be given access to the Luna Control Center. Akamai admits that the image in paragraph 7 of the Complaint purports to be a screenshot of the Luna Control Center. Akamai denies the remaining allegations set forth in paragraph 7 of the Complaint.

8.   Akamai admits that Akamai's Luna Control Center included Luna Resolve. Akamai denies the remaining allegations set forth in paragraph 8 of the Complaint.

9.   Akamai admits that Akamai's website previously stated that "Luna Control Center has flexible mechanisms to secure, control and protect access to different web content and applications." Akamai denies the remaining allegations set forth in paragraph 9 of the Complaint.

10.   Akamai admits that users of Akamai's Luna Control Center had to log in to gain access to the Akamai Control Center. Akamai admits that the images in paragraphs 6 and 7 of the Complaint purport to be screenshots of the Luna Control Center. To the extent paragraph 10 of the Complaint contains additional allegations, Akamai denies them.

11.   Akamai admits that Akamai's website previously stated that a user "can arrange and customize widgets to layout a dashboard with the most relevant information in a consumable and comprehensive way." Akamai denies the remaining allegations set forth in paragraph 11 of the Complaint.

12.   Akamai admits that Akamai's website previously stated that "[u]pon entry to Luna Control Center, users may customize their home page to reference the most relevant CDN management information quickly." Akamai denies the remaining allegations set forth in paragraph 12 of the Complaint.

13.   Akamai admits that the image in paragraph 13 of the Complaint purports to be a screenshot of an Akamai webpage from an unspecified time. Akamai denies the remaining allegations set forth in paragraph 13 of the Complaint.

14.   Akamai admits that the Luna Control Center could be accessed by entering http://control.akamai.com into a web browser. Akamai admits that it operated servers that hosted

the Luna Control Center software. Akamai denies the remaining allegations set forth in paragraph 14 of the Complaint.

15.   Akamai admits that the Luna Control Center included features that could be used to set usernames and passwords, set access and management privileges to different user profiles and manage access rights and privileges based on users' roles. Akamai denies the remaining allegations set forth in paragraph 15 of the Complaint.

16.   Akamai admits that the Luna Control Center included features that could be used to set usernames and passwords, set access and management privileges to different user profiles and manage access rights and privileges based on users' roles. Akamai denies that the image in paragraph 16 of the Complaint appears at the URL: https://developer.akamai.com. Akamai denies the remaining allegations set forth in paragraph 16 of the Complaint.

17.   Akamai denies the allegations set forth in paragraph 17 of the Complaint.

18.   Akamai denies the allegations set forth in paragraph 18 of the Complaint.

19.   Akamai denies the allegations set forth in paragraph 19 of the Complaint.

20.   Akamai admits that it has had knowledge of the existence of the '578 patent since at least the date of service of a complaint alleging patent infringement of the '578 patent against Akamai in the Eastern District of Texas on May 16, 2017, which the plaintiff in that case voluntarily dismissed. Akamai denies the remaining allegations set forth in paragraph 20 of the Complaint.

21.   Akamai denies the allegations set forth in paragraph 21 of the Complaint.

22.   Akamai denies the allegations set forth in paragraph 22 of the Complaint.

COUNT II

23.   Akamai re-asserts and incorporates herein its responses to paragraphs 1-22 above, as though fully set forth herein.

24.   Akamai admits that U.S. Patent No. 7,069,293 ("the '293 patent") recites on its face that its title is "METHODS, SYSTEMS AND COMPUTER PROGRAM PRODUCTS FOR DISTRIBUTION OF APPLICATION PROGRAMS TO A TARGET STATION ON A NETWORK" and that it recites an issue date of June 27, 2006. Akamai admits that Exhibit B of the Complaint purports to be an uncertified copy of the '293 patent. Akamai denies that the '293 patent is a valid or properly issued patent. Akamai lacks knowledge or information sufficient to confirm or deny the remaining allegations set forth in paragraph 24 of the Complaint, and therefore denies them.

25.   Akamai admits that it operated servers that hosted the Luna Control Center software. Akamai denies the remaining allegations set forth in paragraph 25 of the Complaint.

26.   Akamai admits that Akamai uses servers in a content delivery network, including Akamai's edge servers, to facilitate content delivery to end users on behalf of Akamai's customers. To the extent paragraph 26 of the Complaint contains additional allegations, Akamai denies them.

27.   Akamai denies the allegations set forth in paragraph 27 of the Complaint.

28.   Akamai admits that it has had knowledge of the existence of the '293 patent since at least the date of service of a complaint alleging patent infringement of the '293 patent against Akamai in the Eastern District of Texas on May 16, 2017, which the plaintiff in that case voluntarily dismissed. Akamai denies the remaining allegations set forth in paragraph 28 of the Complaint.

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