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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10

11 FONTEM VENTURES B.V., a
12 Netherlands company; and FONTEM
HOLDINGS 1 B.V., a Netherlands
13 company,

14 Plaintiff,

15 v.

16 LOGIC TECHNOLOGY
DEVELOPMENT LLC, a Florida limited
17 liability company, and DOES 1-5,
18 Inclusive,

19 Defendants.
20

Case No: 2:14-cv-01654-GW (MRWx)

**ANSWER TO FIRST AMENDED
COMPLAINT**

DEMAND FOR JURY TRIAL

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1 Defendant Logic Technology Development LLC (“Logic Technology”) hereby
2 answers Plaintiffs Fontem Ventures B.V., and Fontem Holdings 1 B.V. (“Fontem” or
3 “Plaintiffs”) First Amended Complaint for Patent Infringement (“Complaint”) as follows:

4 **JURISDICTION AND VENUE**

5 1. Logic Technology admits that Plaintiffs’ present action purports to be a civil
6 action for patent infringement arising under the patent laws of the United States, 35
7 U.S.C. §§ 101, et seq., and in particular § 271, but Logic Technology denies that
8 Plaintiffs have any viable claim thereunder. Logic Technology denies any wrongdoing or
9 liability on its own behalf.

10 2. Logic Technology admits that this Court has subject matter jurisdiction over
11 this action under 28 U.S.C. §§ 1331 and 1338(a), but denies the legal sufficiency of
12 Plaintiffs’ claims and allegations. Except as so expressly admitted herein, Logic
13 Technology denies the allegations of paragraph 2 of the Complaint.

14 3. Logic Technology denies the allegations of paragraph 3 of the Complaint.

15 4. Logic Technology denies the allegations of paragraph 4 of the Complaint.

16 **PARTIES**

17 5. Logic Technology lacks knowledge or information sufficient to form a belief
18 as to the truth or falsity of the allegations of paragraph 5 of the Complaint, and therefore
19 denies them.

20 6. Logic Technology lacks knowledge or information sufficient to form a belief
21 as to the truth or falsity of the allegations of paragraph 6 of the Complaint, and therefore
22 denies them.

23 7. Logic Technology admits that it is a limited liability company organized and
24 existing under the laws of the State of Florida and has its principal place of business at
25 2004 N.W. 25th Ave., Pompano Beach, Florida, 33069, USA. Except as so expressly
26 admitted herein, Logic Technology denies the allegations of paragraph 7 of the
27 Complaint.

28 8. Logic Technology lacks knowledge or information sufficient to form a belief

1 as to the truth or falsity of the allegations of paragraph 8 of the Complaint, and therefore
2 denies them.

3 **FIRST CAUSE OF ACTION**

4 9. Logic Technology incorporates its responses to the allegations of Paragraphs
5 1-8 as though fully set forth herein.

6 10. Logic Technology admits that the face of U.S. Patent No. 8,365,742 (the
7 “’742 patent”) indicates that it issued on February 5, 2013. Logic Technology denies that
8 the ’742 patent was duly and legally issued. Logic Technology denies that the ’742
9 patent is valid and subsisting in full force and effect. Logic Technology admits that a
10 purported copy of the ’742 patent is attached to the Complaint as Exhibit A. Logic
11 Technology lacks knowledge or information sufficient to form a belief as to the truth or
12 falsity of the remaining allegations of paragraph 10 of the Complaint, and therefore
13 denies them.

14 11. Logic Technology admits that Plaintiff filed a Joint Status Report on
15 February 13, 2014. Logic Technology denies the remaining allegations of paragraph 11
16 of the Complaint.

17 12. Logic Technology denies the allegations of paragraph 12 of the Complaint.

18 13. Logic Technology denies the allegations of paragraph 13 of the Complaint.

19 14. Logic Technology denies the allegations of paragraph 14 of the Complaint.

20 15. Logic Technology denies the allegations of paragraph 15 of the Complaint.

21 16. Logic Technology denies the allegations of paragraph 16 of the Complaint.

22 **SECOND CAUSE OF ACTION**

23 17. Logic Technology incorporates its responses to the allegations of Paragraphs
24 1-8 as though fully set forth herein.

25 18. Logic Technology admits that the face of U.S. Patent No. 8,375,957 (the
26 “’957 patent”) indicates that it issued on February 19, 2013. Logic Technology denies
27 that the ’957 patent was duly and legally issued. Logic Technology denies that the ’957
28 patent is valid and subsisting in full force and effect. Logic Technology admits that a

1 purported copy of the '957 patent is attached to the Complaint as Exhibit B. Logic
2 Technology lacks knowledge or information sufficient to form a belief as to the truth or
3 falsity of the remaining allegations of paragraph 18 of the Complaint, and therefore
4 denies them.

5 19. Logic Technology admits that Plaintiff filed a Joint Status Report on
6 February 13, 2014. Logic Technology denies the remaining allegations of paragraph 19
7 of the Complaint.

8 20. Logic Technology denies the allegations of paragraph 20 of the Complaint.

9 21. Logic Technology denies the allegations of paragraph 21 of the Complaint.

10 22. Logic Technology denies the allegations of paragraph 22 of the Complaint.

11 23. Logic Technology denies the allegations of paragraph 23 of the Complaint.

12 24. Logic Technology denies the allegations of paragraph 24 of the Complaint.

13 **THIRD CAUSE OF ACTION**

14 25. Logic Technology incorporates its responses to the allegations of Paragraphs
15 1-8 as though fully set forth herein.

16 26. Logic Technology admits that the face of U.S. Patent No. 8,393,331 (the
17 "'331 patent") indicates that it issued on March 12, 2013. Logic Technology denies that
18 the '331 patent was duly and legally issued. Logic Technology denies that the '331
19 patent is valid and subsisting in full force and effect. Logic Technology admits that a
20 purported copy of the '331 patent is attached to the Complaint as Exhibit C. Logic
21 Technology lacks knowledge or information sufficient to form a belief as to the truth or
22 falsity of the remaining allegations of paragraph 26 of the Complaint, and therefore
23 denies them.

24 27. Logic Technology admits that Plaintiff filed a Joint Status Report on
25 February 13, 2014. Logic Technology denies the remaining allegations of paragraph 27
26 of the Complaint.

27 28. Logic Technology denies the allegations of paragraph 28 of the Complaint.

28 29. Logic Technology denies the allegations of paragraph 29 of the Complaint.

1 30. Logic Technology denies the allegations of paragraph 30 of the Complaint.

2 31. Logic Technology denies the allegations of paragraph 31 of the Complaint.

3 32. Logic Technology denies the allegations of paragraph 32 of the Complaint.

4 **FOURTH CAUSE OF ACTION**

5 33. Logic Technology incorporates its responses to the allegations of Paragraphs
6 1-8 as though fully set forth herein.

7 34. Logic Technology admits that the face of U.S. Patent No. 8,490,628 (the
8 “’628 patent”) indicates that it issued on July 23, 2013. Logic Technology denies that the
9 ’628 patent was duly and legally issued. Logic Technology denies that the ‘628 patent is
10 valid and subsisting in full force and effect. Logic Technology admits that a purported
11 copy of the ’628 patent is attached to the Complaint as Exhibit D. Logic Technology
12 lacks knowledge or information sufficient to form a belief as to the truth or falsity of the
13 remaining allegations of paragraph 34 of the Complaint, and therefore denies them.

14 35. Logic Technology admits that Plaintiff filed a Joint Status Report on
15 February 13, 2014. Logic Technology denies the remaining allegations of paragraph 35
16 of the Complaint.

17 36. Logic Technology denies the allegations of paragraph 36 of the Complaint.

18 37. Logic Technology denies the allegations of paragraph 37 of the Complaint.

19 38. Logic Technology denies the allegations of paragraph 38 of the Complaint.

20 39. Logic Technology denies the allegations of paragraph 39 of the Complaint.

21 40. Logic Technology denies the allegations of paragraph 40 of the Complaint.

22 **FIFTH CAUSE OF ACTION**

23 41. Logic Technology incorporates its responses to the allegations of Paragraphs
24 1-8 as though fully set forth herein.

25 42. Logic Technology admits that the face of U.S. Patent No. 8,689,805 (the
26 “’805 patent”) indicates that it issued on April 8, 2014. Logic Technology denies that the
27 ’805 patent was duly and legally issued. Logic Technology denies that the ‘805 patent is
28 valid and subsisting in full force and effect. Logic Technology admits that a purported

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