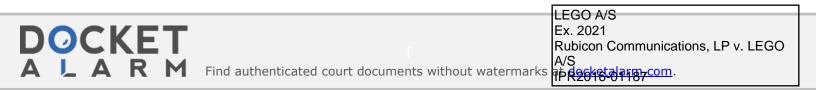
## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

LEGO SYSTEM A/S,	
Plaintiff/Counterclaim-Defendant,	
<b>V</b> .	CIVIL ACTION NO. 15-CV-00823-VLB
RUBICON COMMUNICATIONS, LP DBA SMALLWORKS AND SMALLWORKS, LLC,	JURY TRIAL DEMANDED
Defendants/Counterclaim Plaintiffs.	FEBRUARY 24, 2017
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## DEFENDANTS' RESPONSE TO PLAINTIFF'S SECOND MOTION FOR LEAVE TO AMEND ITS COMPLAINT TO ADD ADDITIONAL DEFENDANTS.

Pursuant to Federal Rule of Civil Procedure Rule 12 and 15, Defendants Rubicon Communications, LP DBA SmallWorks and SmallWorks, LLC ("Defendants") hereby respond to Plaintiff's Second Motion for Leave to Amend its Complaint to Add Additional Defendants ("Motion to Amend"). Attached are Defendants' Memorandum of Law in support of this Response (Ex. A), excerpts from the Deposition of James Thompson (Ex. B – filed under seal), the Certificate of Formation of SmallWorks, LLC (Ex. C), the Declaration of James Thompson (Ex. D), excerpts from the Deposition of Jamie Thompson (Ex. E – filed under seal), and the Declaration of Jamie Thompson (Ex. F). Defendants believe that it is not necessary to add Rubicon Communications LLC as a party defendant, but in light of recent discovery, Defendants will not object to Plaintiff's Motion to Amend as it pertains to adding Rubicon Communications, LLC as an additional defendant. For the reasons stated in the accompanying Memorandum of Law, however, Defendants respectfully request that Plaintiff's Motion to Amend be denied as it pertains to adding Jamie and James Thompson as individual defendants.



DATED: February 24, 2017

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Respectfully Submitted,

By: <u>/s/ Ryan T. Beard</u>

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Attorneys for Defendant/Counterclaim-Plaintiff

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 24, 2017, I electronically filed the foregoing pleading with the clerk of Court using the electronic case filing system of the Court.

<u>/s/ Ryan T. Beard</u> Ryan T. Beard