

information to form a belief as to the truth of the allegations in paragraph 2 of the Complaint and therefore, deny these allegations.

3. U.S. Honda Defendants admit that American Honda Motor Co., Inc. is a California corporation with a place of business at 1919 Torrance Boulevard, Torrance, California 90501.

4. The correct corporate name is Honda of America Mfg., Inc. and not Honda of America Manufacturing, Inc. U.S. Honda Defendants admit that Honda of America Mfg., Inc. is a Ohio corporation with a place of business at 24000 Honda Parkway, Marysville, Ohio 43040.

5. U.S. Honda Defendants admit that Honda Manufacturing of Alabama, LLC is an Alabama limited liability company with a place of business at 1800 Honda Drive, Lincoln, Alabama 35096.

6. U.S. Honda Defendants admit that Honda Manufacturing of Indiana, LLC is an Indiana limited liability company with a place of business at 2755 N. Michigan Ave., Greensburg, Indiana 47240.

JURISDICTION

7. U.S. Honda Defendants admit that the Complaint purports to state a claim for patent infringement pursuant to Title 35 of the United States Code but expressly denies that they infringe or have infringed U.S. Patent No. 7,489,786 (“the ’786 Patent”) or U.S. Patent No. 8,155,342 (“the ’342 Patent”). U.S. Honda Defendants admit that 28 U.S.C. §§ 1331 and 1338(a) confer this Court with “original jurisdiction of any civil action arising under an Act of Congress relating to patents.” U.S. Honda Defendants deny all other allegations in paragraph 7 of the Complaint.

8. U.S. Honda Defendants admit that this Court has personal jurisdiction over U.S. Honda Defendants. U.S. Honda Defendants admit that American Honda Motor Co., Inc.,

directly or through intermediaries, sells vehicles in this judicial district. U.S. Honda Defendants further admit that Honda of America Mfg., Inc., Honda Manufacturing of Alabama, LLC, and Honda Manufacturing of Indiana, LLC manufacture vehicles that are sold within this judicial district. U.S. Honda Defendants expressly deny that they have committed acts of patent infringement and/or have induced acts of patent infringement by others in this district and/or have contributed to patent infringement by others in this judicial district, the State of Texas, or elsewhere in the United States. U.S. Honda Defendants deny all other allegations in paragraph 8 of the Complaint.

9. U.S. Honda Defendants admit that venue is permitted in this district pursuant to 28 U.S.C. § 1400(b), but U.S. Honda Defendants deny that venue is “proper” in this district, and also denies that venue is convenient in this forum pursuant to 28 U.S.C. § 1404.

PATENTS-IN-SUIT

10. U.S. Honda Defendants admit that on its face, the ’786 Patent is entitled “Audio Device Integration System” and bears an issue date of February 10, 2009. U.S. Honda Defendants are without sufficient knowledge or information to form a belief as to the truth of the remaining allegations in paragraph 10 of the Complaint and therefore, deny these allegations.

11. U.S. Honda Defendants admit that on its face, the ’342 Patent is entitled “Multimedia Device Integration System” and bears an issue date of April 10, 2012. U.S. Honda Defendants are without sufficient knowledge or information to form a belief as to the truth of the remaining allegations in paragraph 11 of the Complaint and therefore, deny these allegations.

FACTUAL ALLEGATIONS

12. U.S. Honda Defendants deny that the ’786 Patent and the ’342 Patent are valid and enforceable and thus believe that the ’786 Patent and the ’342 Patent do not lawfully cover

any subject matter. U.S. Honda Defendants deny all other allegations in paragraph 12 of the Complaint.

13. U.S. Honda Defendants admit that American Honda Motor Co., Inc., directly or through intermediaries, sells Honda-branded vehicles in the United States. U.S. Honda Defendants further admit that Honda of America Mfg., Inc., Honda Manufacturing of Alabama, LLC, and Honda Manufacturing of Indiana, LLC manufacture Honda-branded vehicles that are sold within the United States. U.S. Honda Defendants admit that certain Honda-branded vehicles sold in 2013 or later contain the HondaLink system. U.S. Honda Defendants deny all other allegations in paragraph 13 of the Complaint.

14. U.S. Honda Defendants admit that American Honda Motor Co., Inc., directly or through intermediaries, sells Acura-branded vehicles in the United States. U.S. Honda Defendants further admit that Honda of America Mfg., Inc. and Honda Manufacturing of Alabama, LLC manufacture Acura-branded vehicles that are sold within the United States. U.S. Honda Defendants admit that certain Acura-branded vehicles sold in 2013 or later contain the AcuraLink system. U.S. Honda Defendants deny all other allegations in paragraph 14 of the Complaint.

15. U.S. Honda Defendants admit that certain of the vehicles it manufactures and sells have functionality permitting external devices to be connected to the vehicles via wired and wireless connections. U.S. Honda Defendants deny all other allegations in paragraph 15 of the Complaint.

COUNT I
(Infringement of the '786 Patent)

16. U.S. Honda Defendants reassert their responses to paragraphs 1 through 15 of this Answer as though fully set forth herein.

17. U.S. Honda Defendants are without sufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 17 of the Complaint and therefore, deny these allegations.

18. U.S. Honda Defendants deny each and every allegation in paragraph 18 of the Complaint.

19. U.S. Honda Defendants deny each and every allegation in paragraph 19 of the Complaint.

20. U.S. Honda Defendants deny each and every allegation in paragraph 20 of the Complaint.

21. U.S. Honda Defendants deny each and every allegation in paragraph 21 of the Complaint.

22. U.S. Honda Defendants deny each and every allegation in paragraph 22 of the Complaint.

23. U.S. Honda Defendants deny each and every allegation in paragraph 23 of the Complaint.

COUNT II
(Infringement of the '342 Patent)

24. U.S. Honda Defendants reassert their responses to paragraphs 1 through 15 of this Answer as though fully set forth herein.

25. U.S. Honda Defendants are without sufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 25 of the Complaint and therefore, deny these allegations.

26. U.S. Honda Defendants deny each and every allegation in paragraph 26 of the Complaint.

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