

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

GODO KAISHA IP BRIDGE 1,

Plaintiff,

v.

BROADCOM LIMITED, BROADCOM
CORPORATION, AVAGO TECHNOLOGIES,
LTD., AVAGO TECHNOLOGIES U.S., INC.,
and LSI CORPORATION,

Defendants.

Case No. 2:16-cv-134

DEMAND FOR JURY TRIAL

**ANSWER OF GODO KAISHA IP BRIDGE 1 TO BROADCOM CORPORATION,
AVAGO TECHNOLOGIES U.S., INC., AND LSI CORPORATION'S
AMENDED COUNTERCLAIMS**

Plaintiff Godo Kaisha IP Bridge 1 ("IP Bridge" or "Plaintiff"), for its Answer to the Amended Counterclaims of Defendants Broadcom Corporation ("Broadcom Corp."), Avago Technologies U.S., Inc. ("Avago U.S."), and LSI Corporation ("LSI") (collectively, "Counterclaimants"), avers as follows:

THE PARTIES

1. IP Bridge is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1, and therefore denies them.
2. IP Bridge is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 2, and therefore denies them.
3. IP Bridge is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 3, and therefore denies them.

4. Admits that IP Bridge states in its Complaint and First Amended Complaint that it is a Japanese Corporation with its principal place of business located at c/o Sakura Sogo Jimusho, 1-11 Kanda Jimbocho, Chiyoda-ku, Tokyo, 101-0051, Japan.

JURISDICTION AND VENUE

5. Admits that this Court has jurisdiction over Counterclaimants' counterclaims under 28 U.S.C. §§ 1331, 1338(a), and 2201.

6. For purposes of this action only, IP Bridge does not contest that it is subject to personal jurisdiction in this District; and otherwise denies the allegations of paragraph 6 of the Amended Counterclaims.

7. Admits that venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b).

8. Admits that an actual and justiciable controversy exists between the parties; and otherwise denies the allegations of paragraph 8 of the Amended Counterclaims.

BACKGROUND

9. Admits that on February 15, 2016 IP Bridge filed the instant suit asserting infringement of U.S. Patent Nos. 6,538,324 ("the '324 Patent"), 6,197,696 ("the '696 Patent"), 7,126,174 ("the '174 Patent"), 8,354,726 ("the '726 Patent"), RE43,729 ("the RE'729 Patent"), and RE41,980 ("the RE'980 Patent") (collectively, "the Asserted Patents").

10. Admits that IP Bridge owns by assignment the entire right, title, and interest in and to the Asserted Patents, including the right to sue and recover damages, including damages for past infringement; and otherwise denies the allegations of paragraph 10 of the Counterclaims.

11. Admits that IP Bridge has claimed in its Complaint and First Amended Complaint that Broadcom Corporation, Avago Technologies U.S., Inc., and LSI Corporation have infringed and are infringing one or more claims of each of the Asserted Patents.

RESPONSE TO COUNT 1 – INVALIDITY OF U.S. PATENT NO. 6,197,696

12. IP Bridge realleges and incorporates by reference its responses, above, to the allegations set forth in paragraphs 1-11 of the Amended Counterclaims.

13. Denies the allegations of paragraph 13 of the Amended Counterclaims.

14. Denies the allegations of paragraph 14 of the Amended Counterclaims.

RESPONSE TO COUNT II – NON-INFRINGEMENT OF U.S. PATENT NO. 6,197,696

15. IP Bridge realleges and incorporates by reference its responses, above, to the allegations set forth in paragraphs 1-14 of the Amended Counterclaims.

16. Denies the allegations of paragraph 16 of the Amended Counterclaims.

17. Denies the allegations of paragraph 17 of the Amended Counterclaims.

18. Denies the allegations of paragraph 18 of the Amended Counterclaims.

RESPONSE TO COUNT III – INVALIDITY OF U.S. PATENT NO. 6,538,324

19. IP Bridge realleges and incorporates by reference its responses, above, to the allegations set forth in paragraphs 1-18 of the Amended Counterclaims.

20. Denies the allegations of paragraph 20 of the Amended Counterclaims.

21. Denies the allegations of paragraph 21 of the Amended Counterclaims.

RESPONSE TO COUNT IV – NON-INFRINGEMENT OF U.S. PATENT NO. 6,538,324

22. IP Bridge realleges and incorporates by reference its responses, above, to the allegations set forth in paragraphs 1-21 of the Amended Counterclaims.

23. Denies the allegations of paragraph 23 of the Amended Counterclaims.

24. Denies the allegations of paragraph 24 of the Amended Counterclaims.

25. Denies the allegations of paragraph 25 of the Amended Counterclaims.

RESPONSE TO COUNT V – INVALIDITY OF U.S. PATENT NO. RE41,980

26. IP Bridge realleges and incorporates by reference its responses, above, to the allegations set forth in paragraphs 1-25 of the Amended Counterclaims.

27. Denies the allegations of paragraph 27 of the Amended Counterclaims.

28. Denies the allegations of paragraph 28 of the Amended Counterclaims.

RESPONSE TO COUNT VI – NON-INFRINGEMENT OF U.S. PATENT NO. RE41,980

29. IP Bridge realleges and incorporates by reference its responses, above, to the allegations set forth in paragraphs 1-28 of the Amended Counterclaims.

30. Denies the allegations of paragraph 30 of the Amended Counterclaims.

31. Denies the allegations of paragraph 31 of the Amended Counterclaims.

32. Denies the allegations of paragraph 32 of the Amended Counterclaims.

RESPONSE TO COUNT VII – INVALIDITY OF U.S. PATENT NO. 7,126,174

33. IP Bridge realleges and incorporates by reference its responses, above, to the allegations set forth in paragraphs 1-32 of the Amended Counterclaims.

34. Denies the allegations of paragraph 34 of the Amended Counterclaims.

35. Denies the allegations of paragraph 35 of the Amended Counterclaims.

RESPONSE TO COUNT VIII – NON-INFRINGEMENT OF U.S. PATENT NO. 7,126,174

36. IP Bridge realleges and incorporates by reference its responses, above, to the allegations set forth in paragraphs 1-35 of the Amended Counterclaims.

37. Denies the allegations of paragraph 37 of the Amended Counterclaims.

38. Denies the allegations of paragraph 38 of the Amended Counterclaims.

39. Denies the allegations of paragraph 39 of the Amended Counterclaims.

RESPONSE TO COUNT IX – INVALIDITY OF U.S. PATENT NO. 8,354,726

40. IP Bridge realleges and incorporates by reference its responses, above, to the allegations set forth in paragraphs 1-39 of the Amended Counterclaims.

41. Denies the allegations of paragraph 41 of the Amended Counterclaims.

42. Denies the allegations of paragraph 42 of the Amended Counterclaims.

RESPONSE TO COUNT X – NON-INFRINGEMENT OF U.S. PATENT NO. 8,354,726

43. IP Bridge realleges and incorporates by reference its responses, above, to the allegations set forth in paragraphs 1-42 of the Amended Counterclaims.

44. Denies the allegations of paragraph 44 of the Amended Counterclaims.

45. Denies the allegations of paragraph 45 of the Amended Counterclaims.

46. Denies the allegations of paragraph 46 of the Amended Counterclaims.

RESPONSE TO COUNT XI – INVALIDITY OF U.S. PATENT NO. RE43,729

47. IP Bridge realleges and incorporates by reference its responses, above, to the allegations set forth in paragraphs 1-46 of the Amended Counterclaims.

48. Denies the allegations of paragraph 48 of the Amended Counterclaims.

49. Denies the allegations of paragraph 49 of the Amended Counterclaims.

50. Denies the allegations of paragraph 50 of the Amended Counterclaims.

RESPONSE TO COUNT XII – NON-INFRINGEMENT OF U.S. PATENT NO. RE43,729

51. IP Bridge realleges and incorporates by reference its responses, above, to the allegations set forth in paragraphs 1-50 of the Amended Counterclaims.

52. Denies the allegations of paragraph 52 of the Amended Counterclaims.

53. Denies the allegations of paragraph 53 of the Amended Counterclaims.

54. Denies the allegations of paragraph 54 of the Amended Counterclaims.

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