

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

SLYDE ANALYTICS LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:23-cv-00083-RWS-RSP

JURY TRIAL DEMANDED

**PLAINTIFF SLYDE ANALYTICS LLC'S ANSWER TO DEFENDANTS SAMSUNG
ELECTRONICS CO., LTD.'S AND SAMSUNG ELECTRONICS AMERICA, INC.'S
COUNTERCLAIMS**

Plaintiff/Counterclaim-Defendant Slyde Analytics LLC ("Slyde" or "Plaintiff"), as and for its Answer to the Counterclaims of Defendants/Counterclaim-Plaintiffs Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Samsung" or "Defendants"), states as follows:

ANSWER TO COUNTERCLAIMS

Slyde denies all allegations contained in headings preceding individually numbered paragraphs of the Counterclaims. Slyde denies all allegations in the Counterclaims to the extent not expressly admitted. Slyde hereby responds to the individually numbered paragraphs of the Counterclaims as follows:

COUNTERCLAIMS

1. The allegations in Paragraph 1 of the Counterclaims state no legal conclusions or factual allegations to which a response is required. To the extent a response is required, Slyde denies the allegations in Paragraph 1 of the Counterclaims.

BACKGROUND

2. Slyde admits that it is the assignee and owner of the Patents-in-Suit, as alleged in the Complaint.¹ See Dkt. 1. To the extent Samsung alleges Slyde is not the assignee and owner of the Patents-in-Suit, Slyde denies these allegations.

3. Slyde admits that it has accused Samsung of infringing the Patents-in-Suit and avers that the remainder of this paragraph contains legal conclusions to which no responsive pleading is required.

4. Slyde admits the allegations in Paragraph 4 of the Counterclaims to the extent it alleges an actual case and controversy exists between Slyde and Samsung concerning Samsung's infringement of the Patents-In-Suit and avers that the remainder of this paragraph contains legal conclusions to which no responsive pleading is required.

THE PARTIES

5. Slyde admits the allegations in Paragraph 5 of the Counterclaims.

6. Slyde admits the allegations in Paragraph 6 of the Counterclaims.

7. Slyde admits the allegations in Paragraph 7 of the Counterclaims.

JURISDICTION AND VENUE

8. Slyde admits that Paragraph 8 of the Counterclaims asserts that jurisdiction arises under 28 U.S.C. §§ 2201 and 2202. Slyde further admits the Paragraph 8 of the Counterclaims asserts this Court has subject matter jurisdiction over these Counterclaims under 28 U.S.C. §§ 1331 and 1338(a). Slyde further admits that Paragraph 8 of the Counterclaims asserts that the

¹ Any defined terms used herein shall be ascribed the meaning set forth in the Complaint and/or Counterclaims, unless otherwise expressly stated.

Counterclaims arise under the patent laws of the United States and avers that the remainder of this paragraph contains legal conclusion to which no responsive pleading is required.

9. Slyde admits that personal jurisdiction in this District is proper and avers that the remainder of this paragraph contains legal conclusion to which no responsive pleading is required.

10. Slyde admits that venue in this District is proper and avers that the remainder of this paragraph contains legal conclusion to which no responsive pleading is required.

FIRST COUNTERCLAIM
(Non-Infringement of the '678 Patent)

11. Slyde incorporates by reference its response to Paragraphs 1 through 10 of the Counterclaims as if set forth herein at length.

12. Slyde admits an actual controversy exists between Slyde and Samsung concerning Samsung's infringement of the '678 Patent and avers that the remainder of this paragraph contains legal conclusions to which no responsive pleading is required.

13. Slyde denies the allegations in Paragraph 13 of the Counterclaims.

14. Slyde denies the allegations in Paragraph 14 of the Counterclaims.

15. Slyde denies the allegations in Paragraph 15 of the Counterclaims.

16. Slyde denies the allegations in Paragraph 16 of the Counterclaims.

17. Slyde denies the allegations in Paragraph 17 of the Counterclaims.

SECOND COUNTERCLAIM
(Non-Infringement of the '085 Patent)

18. Slyde incorporates by reference its response to Paragraphs 1 through 17 of the Counterclaims as if set forth herein at length.

19. Slyde admits an actual controversy exists between Slyde and Samsung concerning Samsung's infringement of the '085 Patent and avers that the remainder of this paragraph contains legal conclusions to which no responsive pleading is required.

20. Slyde denies the allegations in Paragraph 20 of the Counterclaims.

21. Slyde denies the allegations in Paragraph 21 of the Counterclaims.

22. Slyde denies the allegations in Paragraph 22 of the Counterclaims.

23. Slyde denies the allegations in Paragraph 23 of the Counterclaims.

24. Slyde denies the allegations in Paragraph 24 of the Counterclaims.

THIRD COUNTERCLAIM
(Non-Infringement of the '033 Patent)

25. Slyde incorporates by reference its response to Paragraphs 1 through 24 of the Counterclaims as if set forth herein at length.

26. Slyde admits an actual controversy exists between Slyde and Samsung concerning Samsung's infringement of the '033 Patent and avers that the remainder of this paragraph contains legal conclusions to which no responsive pleading is required.

27. Slyde denies the allegations in Paragraph 27 of the Counterclaims.

28. Slyde denies the allegations in Paragraph 28 of the Counterclaims.

29. Slyde denies the allegations in Paragraph 29 of the Counterclaims.

30. Slyde denies the allegations in Paragraph 30 of the Counterclaims.

31. Slyde denies the allegations in Paragraph 31 of the Counterclaims.

FOURTH COUNTERCLAIM
(Non-Infringement of the '922 Patent)

32. Slyde incorporates by reference its response to Paragraphs 1 through 31 of the Counterclaims as if set forth herein at length.

33. Slyde admits an actual controversy exists between Slyde and Samsung concerning Samsung's infringement of the '922 Patent and avers that the remainder of this paragraph contains legal conclusions to which no responsive pleading is required.

34. Slyde denies the allegations in Paragraph 34 of the Counterclaims.

35. Slyde denies the allegations in Paragraph 35 of the Counterclaims.

36. Slyde denies the allegations in Paragraph 36 of the Counterclaims.

37. Slyde denies the allegations in Paragraph 37 of the Counterclaims.

38. Slyde denies the allegations in Paragraph 38 of the Counterclaims.

FIFTH COUNTERCLAIM
(Invalidity of the '678 Patent)

39. Slyde incorporates by reference its response to Paragraphs 1 through 38 of the Counterclaims as if set forth herein at length.

40. Slyde denies that the '678 Patent is invalid and avers that the remainder of this paragraph contains legal conclusions to which no responsive pleading is required.

41. Slyde admits an actual controversy exists between Slyde and Samsung concerning Samsung's infringement of the '678 Patent and avers that the remainder of this paragraph contains legal conclusions to which no responsive pleading is required.

42. Slyde denies the allegations in Paragraph 42 of the Counterclaims.

43. Slyde denies the allegations in Paragraph 43 of the Counterclaims.

44. Slyde denies the allegations in Paragraph 44 of the Counterclaims.

SIXTH COUNTERCLAIM
(Invalidity of the '085 Patent)

45. Slyde incorporates by reference its response to Paragraphs 1 through 44 of the Counterclaims as if set forth herein at length.

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