

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

SLYDE ANALYTICS LLC,

Plaintiff,

v.

**GARMIN LTD. and GARMIN
CORPORATION,**

Defendants.

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Case No. 2:24-cv-00215-RWS-RSP

JURY TRIAL DEMANDED

GARMIN LTD.'S ANSWER TO COMPLAINT

Defendant Garmin Ltd. (“Garmin Ltd.”) responds to Plaintiff’s Complaint as follows:

THE PARTIES

1. Garmin Ltd. is without information sufficient to respond to this allegation and therefore denies same.

2. Garmin Ltd. admits it is a Swiss company, organized and existing under the laws of Switzerland, with a principal place of business located at Mühlenstrasse 2, 8200 Schaffhausen, Switzerland. Garmin admits that some third parties may sell Garmin products at the addresses listed. As to all remaining facts, denied.

3. Garmin Corporation has not yet been served. Garmin Corporation therefore has no obligation to respond to Slyde’s Complaint and does not do so herein.

JURISDICTION

4. Garmin Ltd. admits that this Court has subject matter jurisdiction and that this is a patent action. Garmin denies any and all allegations of infringement.

5. Garmin Ltd. denies that jurisdiction is proper. For this matter alone, Garmin waives its right to move to dismiss for lack of jurisdiction.

6. Garmin Ltd. admits that venue is proper pursuant to 28 U.S.C. § 1391(c)(3). As to all other facts, denied.

ASSERTED PATENTS

7. Garmin Ltd. admits that the USPTO issued the ’033 Patent. None of the other statements in paragraph 7 are allegations subject to admittance or denial under Rule 8.

8. Garmin Ltd. admits that the USPTO issued the ’922 Patent. None of the other statements in paragraph 8 are allegations subject to admittance or denial under Rule 8.

9. Garmin Ltd. admits that the USPTO issued the '678 Patent. None of the other statements in paragraph 9 are allegations subject to admittance or denial under Rule 8.

10. Garmin Ltd. admits that the USPTO issued the '085 Patent. None of the other statements in paragraph 10 are allegations subject to admittance or denial under Rule 8.

11. Garmin Ltd. admits that the USPTO issued the '457 Patent. None of the other statements in paragraph 11 are allegations subject to admittance or denial under Rule 8.

12. Garmin Ltd. admits that the USPTO issued the '018 Patent. None of the other statements in paragraph 12 are allegations subject to admittance or denial under Rule 8.

13. Garmin Ltd. admits that the USPTO issued the '134 Patent. None of the other statements in paragraph 13 are allegations subject to admittance or denial under Rule 8.

14. Garmin Ltd. admits that the USPTO issued the '809 Patent. None of the other statements in paragraph 14 are allegations subject to admittance or denial under Rule 8.

15. Garmin Ltd. admits that the USPTO issued the '696 Patent. None of the other statements in paragraph 15 are allegations subject to admittance or denial under Rule 8.

16. Denied.

17. Garmin Ltd. is without information sufficient to respond to these allegations and therefore denies same.

FACTUAL ALLEGATIONS

18. Denied.

19. Garmin Ltd. admits that the named inventors on the '033 Patent are Pascal Pozzo Di Borgo and Jorg Hysek. All other allegations are denied.

20. Garmin Ltd. admits that the named inventors on the '922 Patent are Pascal Pozzo

Di Borgo and Jorg Hysek. All other allegations are denied.

21. Ltd. Garmin admits the named inventors are Alex Bezing, Adrian Mohni, Daniel Pfeifer, and Musa Dogan. All other allegations are denied.

22. Garmin Ltd. admits the named inventors are Patrick Flaction, Jacques Quievre, and Jean- Benoit Morin. Garmin denies all other allegations.

23. Garmin Ltd. admits the named inventor is Patrick Flaction. Garmin denies all other allegations.

24. Garmin Ltd. admits the named inventors are Jérôme Corre, Steve DeVènes, Frédéric Lamon, Stefan Hochuli Paychère, and Christophe Ramstein. Garmin denies all other allegations.

25. Garmin Ltd. admits the named inventors are Cyrille Gindre, Frederic Lamon. Christophe Ramstein, and Patrick Flaction. Garmin denies all other allegations.

26. Denied.

COUNT I

(Infringement of the '678 Patent)

27. Garmin Ltd. incorporates by reference its responses in paragraphs 1-26 as if fully set forth herein.

28. Admit that Garmin Ltd. has not taken a license to any of the Asserted Patents.

29. Denied.

30. Denied.

31. Garmin Ltd. admits that the Forerunner 965 can be turned on and off. Garmin admits that specific watch can be set in various ways to preserve battery life. As to any other

allegations in this paragraph, denied.

32. Garmin Ltd. admits that the Forerunner 965 has a touch display, an accelerometer, and several processors. As to the remaining allegations, denied.¹

33. Denied.

34. Garmin Ltd. admits that the Forerunner 965 has a feature a customer can select that allows a “Gesture” to turn on the screen. That Gesture is turning your arm to look at your wrist. As to all other allegations, denied.

35. Denied.

36. Denied.

37. Denied.

38. Denied.

39. Denied.

COUNT II

(Infringement of the '085 Patent)

40. Garmin Ltd. incorporates by reference its responses in paragraphs 1-39 as if fully set forth herein.

41. Garmin Ltd. admits that it has not taken a license to any of the Asserted Patents.

42. Denied.

43. Denied.

¹ See Garmin Forerunner 965 Watch Owner’s Manual at p. 81, available at: https://www8.garmin.com/manuals/webhelp/GUID-0221611A-992D-495E-8DED-1DD448F7A066/EN-US/Forerunner_965_OM_EN-US.pdf.

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