

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

**CELLULAR COMMUNICATIONS
EQUIPMENT LLC,**
Plaintiff,

v.

LG ELECTRONICS, INC., et al.,
Defendants.

Civil Action No. 6:14-cv-982-JRG-KNM

CONSOLIDATED LEAD CASE

JURY TRIAL DEMANDED

**LG ELECTRONICS, INC. AND LG ELECTRONICS U.S.A., INC.’S
ANSWER AND ADDITIONAL DEFENSES TO PLAINTIFF’S FIRST AMENDED
COMPLAINT FOR PATENT INFRINGEMENT**

Defendants LG Electronics, Inc. and LG Electronics U.S.A., Inc. (collectively, “LG Electronics”), by and through their attorneys, answer the First Amended Complaint (“complaint”) of plaintiff Cellular Communications Equipment LLC (“plaintiff” or “CCE”) as follows:

THE PARTIES

1. Cellular Communications Equipment LLC (“CCE”) is a Texas limited liability company with its principal place of business in Plano, Texas.

Answer: LG Electronics is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1 of the complaint and, therefore, denies such allegations.

2. On information and belief, LG Electronics, Inc. is incorporated under the laws of South Korea with its principal place of business at LG Twin Towers 20, Yeouido-dong, Yeongdeunspo-gu, Seoul 150-721, South Korea. This Defendant may be served with process at its principal place of business at LG Twin Towers 20, Yeouido-dong, Yeongdeunspo-gu, Seoul 150-721, South Korea. This Defendant does business in the State of Texas and in the Eastern District of Texas.

Answer: LG Electronics admits that LG Electronics, Inc. is incorporated under the laws

of South Korea and is located at LG Twin Towers, 20, Yeouido-dong, Yeongdeungpo-gu, Seoul, 150-721, South Korea. LG Electronics admits that it may be served with process at LG Twin Towers, 20, Yeouido-dong, Yeongdeungpo-gu, Seoul, 150-721, South Korea. It is unnecessary to admit or deny the remaining allegations in paragraph 2 of the complaint because LG Electronics, Inc. consents to the personal jurisdiction of this Court for the purpose of this action only.

3. LG Electronics U.S.A., Inc. (with LG Electronics, Inc., “LG”) is a Delaware corporation with its principal place of business in Englewood Cliffs, New Jersey. This Defendant may be served with process through its agent, United States Corporation Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808. This Defendant does business in the State of Texas and in the Eastern District of Texas.

Answer: LG Electronics admits that LG Electronics U.S.A., Inc. is a Delaware corporation with offices in Englewood Cliffs, New Jersey. LG Electronics admits that LG Electronics U.S.A., Inc. may be served with process through its agent, United States Corporation Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808. It is unnecessary to admit or deny the remaining allegations in paragraph 3 of the complaint because LG Electronics U.S.A., Inc. consents to the personal jurisdiction of this Court for the purpose of this action only.

4. AT&T Mobility LLC (“AT&T”) is a Delaware limited liability company with its principal place of business in Atlanta, Georgia. This Defendant may be served with process through its agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801. This Defendant does business in the State of Texas and in the Eastern District of Texas.

Answer: LG Electronics is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 4 of the complaint and, therefore, denies such allegations.

5. Verizon Communications Inc. is a Delaware corporation with its principal place of business in New York, New York. This Defendant may be served with process through its agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801. This Defendant does business in the State of Texas and in the Eastern District of Texas.

Answer: LG Electronics is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of the complaint and, therefore, denies such allegations.

6. Cellco Partnership d/b/a Verizon Wireless (with Verizon Communications Inc., “Verizon”) is a Delaware general partnership with its principal place of business in Basking Ridge, New Jersey. This Defendant may be served with process through its agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801. This Defendant does business in the State of Texas and in the Eastern District of Texas.

Answer: LG Electronics is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 6 of the complaint and, therefore, denies such allegations.

7. Sprint Nextel Corporation is a Kansas corporation with its principal place of business in Overland Park, Kansas. This Defendant may be served with process through its agent, Corporation Service Company, 200 S.W. 30th Street, Topeka, Kansas 66611. This Defendant does business in the State of Texas and in the Eastern District of Texas.

Answer: LG Electronics is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 7 of the complaint and, therefore, denies such allegations.

8. Sprint Solutions, Inc. is a Delaware corporation with its principal place of business in Reston, Virginia. This Defendant may be served with process through its agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808. This Defendant does business in the State of Texas and in the Eastern District of Texas.

Answer: LG Electronics is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 8 of the complaint and, therefore, denies such allegations.

9. Sprint Spectrum L.P. is a Delaware limited partnership with its principal place of business in Overland Park, Kansas. This Defendant may be served with process through its agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808. This Defendant does business in the State of Texas and in the Eastern District of Texas.

Answer: LG Electronics is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 9 of the complaint and, therefore, denies such allegations.

10. Boost Mobile, LLC (with Sprint Nextel Corporation, Sprint Solutions, Inc., and Sprint Spectrum L.P., “Sprint”) is a Delaware limited liability company with its principal place of business in Irvine, California. This Defendant may be served with process through its agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808. This Defendant does business in the State of Texas and in the Eastern District of Texas.

Answer: LG Electronics is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of the complaint and, therefore, denies such allegations.

11. T-Mobile USA, Inc. is a Delaware corporation with a principal place of business in Bellevue, Washington. This Defendant may be served with process through its agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808. This Defendant does business in the State of Texas and in the Eastern District of Texas.

Answer: LG Electronics is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 11 of the complaint and, therefore, denies such allegations.

12. T-Mobile US, Inc. (with T-Mobile USA, Inc., “T-Mobile”) is a Delaware corporation with its principal place of business in Bellevue, Washington. This Defendant may be served with process through its agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808. This Defendant does business in the State of Texas and in the Eastern District of Texas.

Answer: LG Electronics is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 12 of the complaint and, therefore, denies such allegations.

JURISDICTION AND VENUE

13. This action arises under the patent laws of the United States, namely 35 U.S.C. §§ 271, 281, and 284-285, among others.

Answer: LG Electronics admits that the complaint contains allegations that purport to arise under the patent laws of the United States.

14. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a), and 1367.

Answer: LG Electronics admits that this Court has jurisdiction over the subject matter pursuant to 28 U.S.C. §§ 1331, 1338(a), and/or 1367.

15. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b) and (c), and 1400(b). On information and belief, each Defendant is deemed to reside in this judicial district, has committed acts of infringement in this judicial district, has purposely transacted business in this judicial district, and/or has regular and established places of business in this judicial district.

Answer: LG Electronics denies that it has committed any acts of infringement in this or any other district. LG Electronics consents, however, to venue in this district for the purpose of this action only.

16. On information and belief, each Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Texas Long Arm Statute, due at least to their substantial and pervasive business in this State and judicial district, including: (i) at least part of their infringing activities alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent conduct, and/or deriving substantial revenue from goods sold and services provided to Texas residents.

Answer: LG Electronics denies that it has committed any acts of infringement in this or any other district. LG Electronics consents, however, to the personal jurisdiction of this Court for the purpose of this action only.

17. More specifically, Defendants' substantial contacts with the forum include, but are not limited to: (i) the manufacture, marketing, sale, distribution, and use of LG mobile devices; (ii) the marketing and sale of services for mobile device communications; (iii) the ownership and/or operation of stores where LG mobile devices are sold and serviced; and/or (iv) the provision of technical and customer support for LG mobile devices and attendant mobile device communications services.

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