

5. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

6. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

7. BP Production denies that BP America, Inc. can be served through the CT entity at the address identified in this Paragraph; and admits the remaining allegations of this Paragraph.

8. BP Production denies that BP America Production Company can be served through the CT entity at the address identified in this Paragraph; and admits the remaining allegations of this Paragraph.

9. BP Production admits that BP p.l.c. is a British public limited company with its corporate headquarters in London, England, SW1Y 4PD and that BP America, Inc. and BP America Production Company are indirectly wholly-owned subsidiaries of BP p.l.c. BP Production denies the remaining allegations of this Paragraph.

10. Admitted that, in general, claims for patent infringement arise under the cited statutes; denied that the Complaint actually asserts a claim for patent infringement under the cited statutes.

11. Admitted.

12. BP Production denies the allegations in the first sentence of this Paragraph. BP Production denies the allegations in the second and third sentences of this Paragraph including allegations that these two sentences are an “example” of the allegations in the first sentence; except that BP Production admits that BP has reported its largest number of employees were in Houston, 6000+ employees were in Texas and 28,000+ jobs were supported in Texas, \$160

million+ royalties, property, production and state income/franchise taxes were paid in Texas, \$9.2 million was spent with vendors, and Texas-based activities included oil and gas exploration and production, research and innovation, natural gas and power trading, petrochemical production and wind power generation, but denies that those activities were performed by the entities specified in this Paragraph or lacks knowledge or information sufficient to form a belief as to the attribution of the entities specified in this Paragraph and therefore denies them. BP Production denies the remaining allegations of this Paragraph.

13. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

14. Denied.

15. Denied.

16. Admitted.

17. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

18. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

19. Denied.

20. Admitted.

21. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

22. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

23. Denied.

24. Admitted.

25. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

26. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

27. Denied.

28. Admitted.

29. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

30. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

31. Denied.

32. Admitted.

33. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

34. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

35. Denied.

36. Admitted.

37. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

38. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

39. Denied.

40. Admitted.

41. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

42. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

43. Denied.

44. Admitted.

45. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

46. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

47. Denied.

48. Admitted.

49. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

50. BP Production lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph, and therefore denies them.

51. Denied.

52. Admitted.

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