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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SAGE ELECTROCHROMICS, INC., Plaintiff–Counterclaim Defendant, vs. **VIEW, INC.**, Defendant–Counterclaimant.	No. C-12-6441 (JST) **DEFENDANT–COUNTERCLAIMANT VIEW, INC.'S ANSWER TO PLAINTIFF AND COUNTERCLAIM-DEFENDANT SAGE ELECTROCHROMICS, INC.'S COUNTERCLAIMS**

ANSWER

Defendant-Counterclaimant View, Inc. ("View"), by and through its undersigned counsel, hereby answers the Counterclaims ("Counterclaims") brought by Plaintiff-Counterclaim Defendant Sage Electrochromics, Inc. ("Sage") as follows, with each paragraph of the answer below responding to the corresponding numbered or lettered paragraph of the Counterclaims:

PARTIES

1. View lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1 of the Complaint, and denies them on that basis.

2. Admitted.

3. Admitted.

JURISDICTION AND VENUE

4. View admits that the Counterclaims purport to state a cause of action under the patent laws of the United States, 35 U.S.C. § 271 *et seq.*, and that the Counterclaims have invoked this Court's subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a). View denies that Sage is entitled to relief and any remaining allegations of paragraph 4 of the Counterclaims.

5. Admitted.

6. View admits that in its Second Amended Answer and Counterclaims to Sage's Complaint, Dkt. 58, View admitted, and continues to admit for purposes of this action only, that this Court has personal jurisdiction over View. View further admits that it has asserted Counterclaims against Sage in this Court, thereby subjecting View to personal jurisdiction in this Court for purposes of such Counterclaims. View denies the remaining allegations of paragraph 6 of the Counterclaims.

7. View admits, for purposes of this action only, that venue is proper in this district pursuant to 28 U.S.C. §§ 1391 and 1400(b).

COUNT I

(Declaratory Judgment of Non-Infringement of the ’357 Patent)

8. View incorporates its responses to paragraphs 1–7 of the Counterclaims as if fully set forth herein.

9. Admitted.

10. Admitted.

11. Denied.

12. Denied.

COUNT II

(Declaratory Judgment of Non-Infringement of the ’851 Patent)

13. View incorporates its responses to paragraphs 1–12 of the Counterclaims as if fully set forth herein.

14. Admitted.

15. Admitted.

16. Denied.

17. Denied.

COUNT III

(Declaratory Judgment of Invalidity of the ’357 Patent)

18. View incorporates its responses to paragraphs 1-17 of the Counterclaims as if fully set forth herein.

19. Denied.

20. Denied.

COUNT IV

(Declaratory Judgment of Invalidity of the ’851 Patent)

21. View incorporates its responses to paragraphs 1-20 of the Counterclaims as if fully set forth herein.

22. Denied.

23. Denied.

COUNT V

(Declaratory Judgment of Non-Infringement of the '603 Patent)

24. View incorporates its responses to paragraphs 1-23 of the Counterclaims as if fully set forth herein.

25. Admitted.

26. Admitted.

27. Denied.

28. Denied.

COUNT VI

(Declaratory Judgment of Invalidity of the '603 Patent)

29. View incorporates its responses to paragraphs 1-28 of the Counterclaims as if fully set forth herein.

30. Denied.

31. Denied.

RESPONSE TO PRAYER FOR RELIEF

View denies that Sage is entitled to any relief whatsoever.

32. View denies that Sage is entitled to the relief requested in paragraph 32.

33. View denies that Sage is entitled to the relief requested in paragraph 33.

34. View denies that Sage is entitled to the relief requested in paragraph 34.

35. View denies that Sage is entitled to the relief requested in paragraph 35.

36. View denies that Sage is entitled to the relief requested in paragraph 36.

37. View denies that Sage is entitled to the relief requested in paragraph 37.

38. View denies that Sage is entitled to the relief requested in paragraph 38.

39. View denies that Sage is entitled to the relief requested in paragraph 39.

40. View denies that Sage is entitled to the relief requested in paragraph 40.

41. View denies that Sage is entitled to the relief requested in paragraph 41.

View denies all remaining allegations in Sage's Counterclaims not listed above.

DATED: July 8, 2013

WILMER CUTLER PICKERING HALE AND DORR LLP

By: /s/ Keith Slenkovich
Keith Slenkovich

Attorneys for Defendant-Counterclaimant View, Inc.