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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

NATURAL ALTERNATIVES INTERNATIONAL, INC., Plaintiff, v. CREATIVE COMPOUNDS, INC., Defendant.	Case No. 15CV2081 JM RBB **ANSWER** DEMAND FOR JURY TRIAL

COMES NOW, Defendant, Creative Compounds, LLC ("Creative"), and hereby answers Natural Alternatives International, Inc.'s (NAI) Complaint as follows:

1. Creative is without knowledge or information sufficient to form a belief as to truth of the first sentence of the allegations of paragraph 1 and therefore denies the same. Creative denies the allegation of the second sentence of paragraph 2. Creative admits that it sent an internet

communication on or about September 5, 2015, but denies the remaining allegations of the third sentence of paragraph 1 and the allegations of the fourth sentence of paragraph 1.

2. Creative is without knowledge or information sufficient to form a belief as to truth of the allegations of paragraph 2 and therefore denies the same.

3. Creative denies that it is a Nevada corporation, but admits it has a principal place of business of 600 Daugherty, Scott City, MO.

4. Subject matter jurisdiction is admitted.

5. Personal jurisdiction is admitted.

6. Proper venue is admitted.

7. Creative is without knowledge or information sufficient to form a belief as to truth of the allegations of paragraph 7 and therefore denies the same.

8. Creative is without knowledge or information sufficient to form a belief as to truth of the allegations of paragraph 8 and therefore denies the same.

9. Creative is without knowledge or information sufficient to form a belief as to truth of the allegations of paragraph 9 and therefore denies the same.

10. Creative is without knowledge or information sufficient to form a belief as to truth of the allegations of paragraph 10 and therefore denies the same. Creative objects to the content of a website being incorporated into the complaint by reference. The unknown and undescribed allegations of the content of the website are insufficient to be admitted or denied.

11. Creative is without knowledge or information sufficient to form a belief as to truth of the allegations of paragraph 11 and therefore denies the same.

12. Creative is without knowledge or information sufficient to form a belief as to truth of the allegations of paragraph 12 and therefore denies the same.

13. Creative is without knowledge or information sufficient to form a belief as to truth of the allegations of paragraph 13 and therefore denies the same.

14. Admitted.

15. Creative admits the allegations of paragraph 15. Creative objects to the content of a website being incorporated into the complaint by reference. The description of unknown and undescribed allegations of the content of the website are insufficient to be admitted or denied.

16. Admitted.

17. Admitted.

18. Admitted.

19. Creative admits that it is not licensed under NAI's trademarks and that it does not use NAI's trademarks. Creative admits that it is not licensed under NAI's patents and that it does not infringe any valid patent rights owned by NAI. The portion of paragraph 19 pertaining to indemnification is grammatically confusing, as customers of Creative's generic beta alanine would not need indemnification for trademarked beta alanine if they had purchased untrademarked beta alanine. To extent the remaining allegations of paragraph 19 cannot be understood, they are denied.

20. Creative admits that on or about September 5, 2015, Creative sent an email to potential customers of beta alanine describing its willingness to offer beta alanine for sale. Creative is without knowledge or information sufficient to form a belief as to truth of the remaining allegations of paragraph 20 and therefore denies the same.

21. Admitted.

22. Denied.

23. Denied.

24. Creative is without knowledge or information sufficient to form a belief as to truth of the allegations of paragraph 24 and therefore denies the same.

25. Denied.

26. Denied.

27. Denied.

28. Denied.

29. Creative objects to the content of unknown and undescribed documents being incorporated into the complaint by reference. The description of unknown and undescribed allegations of the incorporated content is insufficient to be admitted or denied.

30. Admitted or denied as described above.

31. Denied.

32. Denied.

33. Denied.

34. Denied.

35. Denied.

36. Denied.

37. Denied.

38. Denied.

39. Admitted or denied as described above.

40. Denied.

41. Denied.

42. Denied.

43. Denied.

44. Denied.

45. Denied.

46. Admitted or denied as described above.

47. Denied.

48. Denied.

49. Denied.

50. Denied.

51. Denied.

52. Admitted or denied as described above.

53. Denied.

54. Denied.

55. Denied.

56. Denied.

57. Admitted or denied as described above.

58. Denied.

59. Denied.

60. Denied.

PRAYER FOR RELIEF

Creative denies the allegations contained in the prayer for relief.

AFFIRMATIVE DEFENSE

The Complaint and each and every purported count thereof, fails to state a claim for which relief can be granted against Creative.

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JURY DEMAND

Creative hereby demands a jury trial on all issues so triable.

Respectfully submitted,

By: /s/Heather N. Catron/
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