

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROBERT BOSCH LLC,	)	
	)	
Plaintiff,	)	
	)	C.A. Nos.: 12-574-LPS
	)	14-142-LPS
v.	)	
	)	JURY TRIAL DEMANDED
ALBEREE PRODUCTS, INC., API KOREA CO.,	)	
LTD., SAVER AUTOMOTIVE PRODUCTS, INC.,	)	
and COSTCO WHOLESALE CORPORATION,	)	
	)	
Defendants.	)	

**ANSWER OF API KOREA CO. LTD. TO
SECOND AMENDED COMPLAINT**

Defendant API Korea Co., Ltd. (hereinafter “API”), by and through its undersigned counsel, hereby answers Robert Bosch, LLC’s Second Amended Complaint (“Complaint”) as follows:¹

1. API admits the allegations in paragraph 1 of the Complaint.
2. API admits the Complaint alleges and seeks judgment under the patent laws of the United States, Title 35 of the United States Code (for example, §§ 271, 281, 283, 284 and

¹ API files its responsive pleading to the Second Amended Complaint notwithstanding the fact that its motion to dismiss for lack of personal jurisdiction is presently pending before the Court. Pursuant to rulings made by the Court at the Case Management Conference held on August 4, 2014, the Court’s Oral Order of August 21, 2014 [C.A. No. 12-574 D.I. 56], and Federal Rule of Civil Procedure 13(a), API files its Answer, Affirmative Defenses and Counterclaims to Robert Bosch LLC’s Second Amended Complaint on condition the Court denies API’s motion to dismiss. Pursuant to rulings made by the Court at the Case Management Conference held on August 4, 2014, nothing stated in API’s Answer, Affirmative Defenses and Counterclaims to Robert Bosch LLC’s Second Amended Complaint shall be construed as API’s acquiescence to the jurisdiction of the Court, or an admission that venue is proper, or waiver or withdrawal of its motion to dismiss.

285) and that this Court has subject matter jurisdiction. API denies the remaining allegations in paragraph 2 of the Complaint.

DEFENDANTS AND ACCUSED PRODUCTS

3. API lacks sufficient information to confirm or deny the allegations of paragraph 3 of the Complaint and accordingly denies the same.

4. API admits the allegations of paragraph 4 of the Complaint.

5. API lacks sufficient information to confirm or deny the allegations of paragraph 5 and accordingly denies the same.

6. API lacks sufficient information to confirm or deny the allegations of paragraph 6 and accordingly denies the same.

7. API lacks sufficient information to confirm or deny the allegations of paragraph 7 and accordingly denies the same.

8. API lacks sufficient information to confirm or deny the allegations of paragraph 8 and accordingly denies the same.

9. API lacks sufficient information to confirm or deny the allegations of paragraph 9 and accordingly denies the same.

10. API lacks sufficient information to confirm or deny the allegations of paragraph 10 and accordingly denies the same.

11. API lacks sufficient information to confirm or deny the allegations of paragraph 11 and accordingly denies the same.

12. API lacks sufficient information to confirm or deny the allegations of paragraph 12 and accordingly denies the same.

13. API lacks sufficient information to confirm or deny the allegations of paragraph

13 and accordingly denies the same.

14. API lacks sufficient information to confirm or deny the allegations of paragraph 14 and accordingly denies the same.

15. API lacks sufficient information to confirm or deny the allegations of paragraph 15 and accordingly denies the same.

16. API lacks sufficient information to confirm or deny the allegations of paragraph 16 and accordingly denies the same.

17. API lacks sufficient information to confirm or deny the allegations of paragraph 17 and accordingly denies the same.

18. API lacks sufficient information to confirm or deny the allegations of paragraph 18 and accordingly denies the same.

19. API denies the allegations of paragraph 19 of the Complaint.

20. API admits that Albert Lee and Choon Bae Lee are the named inventors of the '568 patent and that on its face the '568 patent indicates it was assigned to Alberee Products, Inc. API admits the '568 patent claims priority to a Korean patent application. API lacks sufficient information to confirm or deny the remaining allegations in paragraph 20 and accordingly denies the same.

21. API denies the allegations of paragraph 21 of the Complaint.

COUNT ONE – INFRINGEMENT OF U.S. PATENT NO. 6,523,218

22. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

23. API admits a copy of the '218 patent was attached as Exhibit A to the Complaint. API admits that, on its face, the '218 patent lists an issue date of February 25, 2003. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 23 and

accordingly denies the same.

24. API lacks sufficient information to confirm or deny the allegations of paragraph 24 and accordingly denies the same.

25. API lacks sufficient information to confirm or deny the allegations of paragraph 25 and accordingly denies the same.

26. API lacks sufficient information to confirm or deny the allegations of paragraph 26 and accordingly denies the same.

27. API lacks sufficient information to confirm or deny the allegations of paragraph 27 and accordingly denies the same.

28. API denies the allegations of paragraph 28 of the Complaint.

29. API denies the allegations of paragraph 29 of the Complaint.

30. API denies the allegations of paragraph 30 of the Complaint.

31. API denies the allegations of paragraph 31 of the Complaint.

32. API denies the allegations of paragraph 32 of the Complaint.

33. API denies the allegations of paragraph 33 of the Complaint.

34. API denies the allegations of paragraph 34 of the Complaint.

35. API denies the allegations of paragraph 35 of the Complaint.

36. API denies the allegations of paragraph 36 of the Complaint.

37. API lacks sufficient information to confirm or deny the allegations of paragraph 37 and accordingly denies the same.

38. API lacks sufficient information to confirm or deny the allegations of paragraph 38 and accordingly denies the same.

39. API lacks sufficient information to confirm or deny the allegations of paragraph

39 and accordingly denies the same.

40. API lacks sufficient information to confirm or deny the allegations of paragraph 40 and accordingly denies the same.

41. API lacks sufficient information to confirm or deny the allegations of paragraph 41 and accordingly denies the same.

42. API lacks sufficient information to confirm or deny the allegations of paragraph 42 and accordingly denies the same.

43. API lacks sufficient information to confirm or deny the allegations of paragraph 43 and accordingly denies the same.

44. API lacks sufficient information to confirm or deny the allegations of paragraph 44 and accordingly denies the same.

45. API lacks sufficient information to confirm or deny the allegations of paragraph 45 and accordingly denies the same.

46. API lacks sufficient information to confirm or deny the allegations of paragraph 46 and accordingly denies the same.

47. API lacks sufficient information to confirm or deny the allegations of paragraph 47 and accordingly denies the same.

48. API denies the allegations of paragraph 48 of the Complaint.

49. API denies the allegations of paragraph 49 of the Complaint.

50. API denies the allegations of paragraph 50 of the Complaint.

COUNT TWO – INFRINGEMENT OF U.S. PATENT NO. 6,530,111

51. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

52. API admits a copy of the '111 patent was attached as Exhibit B to the Complaint. API admits that, on its face, the '111 patent lists an issue date of March 11, 2003. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 52 and accordingly denies the same.

53. API lacks sufficient information to confirm or deny the allegations of paragraph 53 and accordingly denies the same.

54. API lacks sufficient information to confirm or deny the allegations of paragraph 54 and accordingly denies the same.

55. API lacks sufficient information to confirm or deny the allegations of paragraph 55 and accordingly denies the same.

56. API lacks sufficient information to confirm or deny the allegations of paragraph 56 and accordingly denies the same.

57. API lacks sufficient information to confirm or deny the allegations of paragraph 57 and accordingly denies the same.

58. API lacks sufficient information to confirm or deny the allegations of paragraph 58 and accordingly denies the same.

59. API lacks sufficient information to confirm or deny the allegations of paragraph 59 and accordingly denies the same.

60. API lacks sufficient information to confirm or deny the allegations of paragraph 60 and accordingly denies the same.

61. API lacks sufficient information to confirm or deny the allegations of paragraph 61 and accordingly denies the same.

62. API lacks sufficient information to confirm or deny the allegations of paragraph

62 and accordingly denies the same.

63. API lacks sufficient information to confirm or deny the allegations of paragraph 63 and accordingly denies the same.

64. API lacks sufficient information to confirm or deny the allegations of paragraph 64 and accordingly denies the same.

65. API lacks sufficient information to confirm or deny the allegations of paragraph 65 and accordingly denies the same.

66. API lacks sufficient information to confirm or deny the allegations of paragraph 66 and accordingly denies the same.

COUNT THREE – INFRINGEMENT OF U.S. PATENT NO. 6,553,607

67. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

68. API admits a copy of the '607 patent was attached as Exhibit C to the Complaint. API admits that, on its face, the '607 patent lists an issue date of April 29, 2003. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 68 and accordingly denies the same.

69. API lacks sufficient information to confirm or deny the allegations of paragraph 69 and accordingly denies the same.

70. API lacks sufficient information to confirm or deny the allegations of paragraph 70 and accordingly denies the same.

71. API lacks sufficient information to confirm or deny the allegations of paragraph 71 and accordingly denies the same.

72. API lacks sufficient information to confirm or deny the allegations of paragraph

72 and accordingly denies the same.

73. API lacks sufficient information to confirm or deny the allegations of paragraph 73 and accordingly denies the same.

74. API lacks sufficient information to confirm or deny the allegations of paragraph 74 and accordingly denies the same.

75. API lacks sufficient information to confirm or deny the allegations of paragraph 75 and accordingly denies the same.

76. API lacks sufficient information to confirm or deny the allegations of paragraph 76 and accordingly denies the same.

77. API denies the allegations of paragraph 77 of the Complaint.

78. API lacks sufficient information to confirm or deny the allegations of paragraph 78 and accordingly denies the same.

79. API lacks sufficient information to confirm or deny the allegations of paragraph 79 and accordingly denies the same.

80. API lacks sufficient information to confirm or deny the allegations of paragraph 80 and accordingly denies the same.

81. API lacks sufficient information to confirm or deny the allegations of paragraph 81 and accordingly denies the same.

82. API lacks sufficient information to confirm or deny the allegations of paragraph 82 and accordingly denies the same.

83. API lacks sufficient information to confirm or deny the allegations of paragraph 83 and accordingly denies the same.

COUNT FOUR – INFRINGEMENT OF U.S. PATENT NO. 6.611.988

84. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

85. API admits a copy of the '988 patent was attached as Exhibit D to the Amended Complaint. API admits that, on its face, the '988 patent lists an issue date of September 2, 2003. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 85 and accordingly denies the same.

86. API lacks sufficient information to confirm or deny the allegations of paragraph 86 and accordingly denies the same.

87. API lacks sufficient information to confirm or deny the allegations of paragraph 87 and accordingly denies the same.

88. API lacks sufficient information to confirm or deny the allegations of paragraph 88 and accordingly denies the same.

89. API lacks sufficient information to confirm or deny the allegations of paragraph 89 and accordingly denies the same.

90. API denies the allegations of paragraph 90 of the Complaint.

91. API denies the allegations of paragraph 91 of the Complaint.

92. API denies the allegations of paragraph 92 of the Complaint.

93. API denies the allegations of paragraph 93 of the Complaint.

94. API denies the allegations of paragraph 94 of the Complaint.

95. API denies the allegations of paragraph 95 of the Complaint.

96. API denies the allegations of paragraph 96 of the Complaint.

97. API denies the allegations of paragraph 97 of the Complaint.

98. API denies the allegations of paragraph 98 of the Complaint.

99. API lacks sufficient information to confirm or deny the allegations of paragraph 99 and accordingly denies the same.

100. API lacks sufficient information to confirm or deny the allegations of paragraph 100 and accordingly denies the same.

101. API lacks sufficient information to confirm or deny the allegations of paragraph 101 and accordingly denies the same.

102. API lacks sufficient information to confirm or deny the allegations of paragraph 102 and accordingly denies the same.

103. API lacks sufficient information to confirm or deny the allegations of paragraph 103 and accordingly denies the same.

104. API lacks sufficient information to confirm or deny the allegations of paragraph 104 and accordingly denies the same.

105. API lacks sufficient information to confirm or deny the allegations of paragraph 105 and accordingly denies the same.

106. API lacks sufficient information to confirm or deny the allegations of paragraph 106 and accordingly denies the same.

107. API lacks sufficient information to confirm or deny the allegations of paragraph 107 and accordingly denies the same.

108. API lacks sufficient information to confirm or deny the allegations of paragraph 108 and accordingly denies the same.

109. API lacks sufficient information to confirm or deny the allegations of paragraph 109 and accordingly denies the same.

110. API denies the allegations of paragraph 110 of the Complaint.

111. API denies the allegations of paragraph 111 of the Complaint.

112. API denies the allegations of paragraph 112 of the Complaint.

COUNT FIVE – INFRINGEMENT OF U.S. PATENT NO. 6,675,434

113. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

114. API admits a copy of the '434 patent was attached as Exhibit E to the Complaint. API admits that, on its face, the '434 patent lists an issue date of January 13, 2004. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 114 and accordingly denies the same.

115. API lacks sufficient information to confirm or deny the allegations of paragraph 115 and accordingly denies the same.

116. API lacks sufficient information to confirm or deny the allegations of paragraph 116 and accordingly denies the same.

117. API lacks sufficient information to confirm or deny the allegations of paragraph 117 and accordingly denies the same.

118. API lacks sufficient information to confirm or deny the allegations of paragraph 118 and accordingly denies the same.

119. API denies the allegations of paragraph 119 of the Complaint.

120. API denies the allegations of paragraph 120 of the Complaint.

121. API denies the allegations of paragraph 121 of the Complaint.

122. API denies the allegations of paragraph 122 of the Complaint.

123. API denies the allegations of paragraph 123 of the Complaint.

124. API denies the allegations of paragraph 124 of the Complaint.

125. API denies the allegations of paragraph 125 of the Complaint.

126. API denies the allegations of paragraph 126 of the Complaint.

127. API denies the allegations of paragraph 127 of the Complaint.

128. API lacks sufficient information to confirm or deny the allegations of paragraph 128 and accordingly denies the same.

129. API lacks sufficient information to confirm or deny the allegations of paragraph 129 and accordingly denies the same.

130. API lacks sufficient information to confirm or deny the allegations of paragraph 130 and accordingly denies the same.

131. API lacks sufficient information to confirm or deny the allegations of paragraph 131 and accordingly denies the same.

132. API lacks sufficient information to confirm or deny the allegations of paragraph 132 and accordingly denies the same.

133. API lacks sufficient information to confirm or deny the allegations of paragraph 133 and accordingly denies the same.

134. API lacks sufficient information to confirm or deny the allegations of paragraph 134 and accordingly denies the same.

135. API lacks sufficient information to confirm or deny the allegations of paragraph 135 and accordingly denies the same.

136. API lacks sufficient information to confirm or deny the allegations of paragraph 136 and accordingly denies the same.

137. API lacks sufficient information to confirm or deny the allegations of paragraph 137 and accordingly denies the same.

138. API lacks sufficient information to confirm or deny the allegations of paragraph 138 and accordingly denies the same.

139. API denies the allegations of paragraph 139 of the Complaint.

140. API denies the allegations of paragraph 140 of the Complaint.

141. API denies the allegations of paragraph 141 of the Complaint.

COUNT SIX – INFRINGEMENT OF U.S. PATENT NO. 6,836,926

142. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

143. API admits a copy of the '926 patent was attached as Exhibit F to the Amended Complaint. API admits that, on its face, the '926 patent lists an issue date of January 4, 2005. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 143 and accordingly denies the same.

144. API lacks sufficient information to confirm or deny the allegations of paragraph 144 and accordingly denies the same.

145. API lacks sufficient information to confirm or deny the allegations of paragraph 145 and accordingly denies the same.

146. API lacks sufficient information to confirm or deny the allegations of paragraph 146 and accordingly denies the same.

147. API lacks sufficient information to confirm or deny the allegations of paragraph 147 and accordingly denies the same.

148. API denies the allegations of paragraph 148 of the Complaint.

149. API denies the allegations of paragraph 149 of the Complaint.

150. API denies the allegations of paragraph 150 of the Complaint.

151. API denies the allegations of paragraph 151 of the Complaint.

152. API denies the allegations of paragraph 152 of the Complaint.

153. API denies the allegations of paragraph 153 of the Complaint.

154. API denies the allegations of paragraph 154 of the Complaint.

155. API denies the allegations of paragraph 155 of the Complaint.

156. API denies the allegations of paragraph 156 of the Complaint.

157. API lacks sufficient information to confirm or deny the allegations of paragraph 157 and accordingly denies the same.

158. API lacks sufficient information to confirm or deny the allegations of paragraph 158 and accordingly denies the same.

159. API lacks sufficient information to confirm or deny the allegations of paragraph 159 and accordingly denies the same.

160. API lacks sufficient information to confirm or deny the allegations of paragraph 160 and accordingly denies the same.

161. API lacks sufficient information to confirm or deny the allegations of paragraph 161 and accordingly denies the same.

162. API lacks sufficient information to confirm or deny the allegations of paragraph 162 and accordingly denies the same.

163. API lacks sufficient information to confirm or deny the allegations of paragraph 163 and accordingly denies the same.

164. API lacks sufficient information to confirm or deny the allegations of paragraph 164 and accordingly denies the same.

165. API lacks sufficient information to confirm or deny the allegations of paragraph 165 and accordingly denies the same.

166. API lacks sufficient information to confirm or deny the allegations of paragraph 166 and accordingly denies the same.

167. API lacks sufficient information to confirm or deny the allegations of paragraph 167 and accordingly denies the same.

168. API lacks sufficient information to confirm or deny the allegations of paragraph 168 and accordingly denies the same.

169. API denies the allegations of paragraph 169 of the Complaint.

170. API denies the allegations of paragraph 170 of the Complaint.

171. API denies the allegations of paragraph 171 of the Complaint.

COUNT SEVEN – INFRINGEMENT OF U.S. PATENT NO. 6,944,905

172. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

173. API admits a copy of the '905 patent was attached as Exhibit G to the Amended Complaint. API admits that, on its face, the '905 patent lists an issue date of September 20, 2005. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 173 and accordingly denies the same.

174. API lacks sufficient information to confirm or deny the allegations of paragraph 174 and accordingly denies the same.

175. API lacks sufficient information to confirm or deny the allegations of paragraph 175 and accordingly denies the same.

176. API lacks sufficient information to confirm or deny the allegations of paragraph 176 and accordingly denies the same.

177. API lacks sufficient information to confirm or deny the allegations of paragraph 177 and accordingly denies the same.

178. API denies the allegations of paragraph 178 of the Complaint.

179. API denies the allegations of paragraph 179 of the Complaint.

180. API denies the allegations of paragraph 180 of the Complaint.

181. API denies the allegations of paragraph 181 of the Complaint.

182. API denies the allegations of paragraph 182 of the Complaint.

183. API denies the allegations of paragraph 183 of the Complaint.

184. API denies the allegations of paragraph 184 of the Complaint.

185. API denies the allegations of paragraph 185 of the Complaint.

186. API denies the allegations of paragraph 186 of the Complaint.

187. API lacks sufficient information to confirm or deny the allegations of paragraph 187 and accordingly denies the same.

188. API lacks sufficient information to confirm or deny the allegations of paragraph 188 and accordingly denies the same.

189. API lacks sufficient information to confirm or deny the allegations of paragraph 189 and accordingly denies the same.

190. API lacks sufficient information to confirm or deny the allegations of paragraph 190 and accordingly denies the same.

191. API lacks sufficient information to confirm or deny the allegations of paragraph 191 and accordingly denies the same.

192. API lacks sufficient information to confirm or deny the allegations of paragraph 192 and accordingly denies the same.

193. API lacks sufficient information to confirm or deny the allegations of paragraph 193 and accordingly denies the same.

194. API lacks sufficient information to confirm or deny the allegations of paragraph 194 and accordingly denies the same.

195. API lacks sufficient information to confirm or deny the allegations of paragraph 195 and accordingly denies the same.

196. API lacks sufficient information to confirm or deny the allegations of paragraph 196 and accordingly denies the same.

197. API lacks sufficient information to confirm or deny the allegations of paragraph 197 and accordingly denies the same.

198. API denies the allegations of paragraph 198 of the Complaint.

199. API denies the allegations of paragraph 199 of the Complaint.

200. API denies the allegations of paragraph 200 of the Complaint.

COUNT EIGHT – INFRINGEMENT OF U.S. PATENT NO. 6,973,698

201. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

202. API admits a copy of the '698 patent was attached as Exhibit H to the Amended Complaint. APIe admits that, on its face, the '698 patent lists an issue date of December 13, 2005. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 202 and accordingly denies the same.

203. API lacks sufficient information to confirm or deny the allegations of paragraph 203 and accordingly denies the same.

204. API lacks sufficient information to confirm or deny the allegations of paragraph 204 and accordingly denies the same.

205. API lacks sufficient information to confirm or deny the allegations of paragraph 205 and accordingly denies the same.

206. API lacks sufficient information to confirm or deny the allegations of paragraph 206 and accordingly denies the same.

207. API denies the allegations of paragraph 207 of the Complaint.

208. API denies the allegations of paragraph 208 of the Complaint.

209. API denies the allegations of paragraph 209 of the Complaint.

210. API denies the allegations of paragraph 210 of the Complaint.

211. API denies the allegations of paragraph 211 of the Complaint.

212. API denies the allegations of paragraph 212 of the Complaint.

213. API denies the allegations of paragraph 213 of the Complaint.

214. API denies the allegations of paragraph 214 of the Complaint.

215. API denies the allegations of paragraph 215 of the Complaint.

216. API lacks sufficient information to confirm or deny the allegations of paragraph 216 and accordingly denies the same.

217. API lacks sufficient information to confirm or deny the allegations of paragraph 217 and accordingly denies the same.

218. API lacks sufficient information to confirm or deny the allegations of paragraph 218 and accordingly denies the same.

219. API lacks sufficient information to confirm or deny the allegations of paragraph 219 and accordingly denies the same.

220. API lacks sufficient information to confirm or deny the allegations of paragraph 220 and accordingly denies the same.

221. API lacks sufficient information to confirm or deny the allegations of paragraph 221 and accordingly denies the same.

222. API lacks sufficient information to confirm or deny the allegations of paragraph 222 and accordingly denies the same.

223. API lacks sufficient information to confirm or deny the allegations of paragraph 223 and accordingly denies the same.

224. API lacks sufficient information to confirm or deny the allegations of paragraph 224 and accordingly denies the same.

225. API lacks sufficient information to confirm or deny the allegations of paragraph 225 and accordingly denies the same.

226. API lacks sufficient information to confirm or deny the allegations of paragraph 226 and accordingly denies the same.

227. API lacks sufficient information to confirm or deny the allegations of paragraph 227 and accordingly denies the same.

228. API denies the allegations of paragraph 228 of the Complaint.

229. API denies the allegations of paragraph 229 of the Complaint.

230. API denies the allegations of paragraph 230 of the Complaint.

COUNT NINE – INFRINGEMENT OF U.S. PATENT NO. 7,228,588

231. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

232. API admits a copy of the '588 patent was attached as Exhibit I to the Complaint. API admits that, on its face, the '588 patent lists an issue date of June 12, 2007. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 232 and accordingly denies the same.

233. API lacks sufficient information to confirm or deny the allegations of paragraph

233 and accordingly denies the same.

234. API lacks sufficient information to confirm or deny the allegations of paragraph 234 and accordingly denies the same.

235. API lacks sufficient information to confirm or deny the allegations of paragraph 235 and accordingly denies the same.

236. API lacks sufficient information to confirm or deny the allegations of paragraph 236 and accordingly denies the same.

237. API denies the allegations of paragraph 237 of the Complaint.

238. API denies the allegations of paragraph 238 of the Complaint.

239. API denies the allegations of paragraph 239 of the Complaint.

240. API denies the allegations in paragraph 240 of the Complaint.

241. API denies the allegations of paragraph 241 of the Complaint.

242. API denies the allegations of paragraph 242 of the Complaint.

243. API denies the allegations of paragraph 243 of the Complaint.

244. API denies the allegations of paragraph 244 of the Complaint.

245. API denies the allegations of paragraph 245 of the Complaint.

246. API lacks sufficient information to confirm or deny the allegations of paragraph 246 and accordingly denies the same.

247. API lacks sufficient information to confirm or deny the allegations of paragraph 247 and accordingly denies the same.

248. API lacks sufficient information to confirm or deny the allegations of paragraph 248 and accordingly denies the same.

249. API lacks sufficient information to confirm or deny the allegations of paragraph

249 and accordingly denies the same.

250. API lacks sufficient information to confirm or deny the allegations of paragraph 250 and accordingly denies the same.

251. API lacks sufficient information to confirm or deny the allegations of paragraph 251 and accordingly denies the same.

252. API lacks sufficient information to confirm or deny the allegations of paragraph 252 and accordingly denies the same.

253. API lacks sufficient information to confirm or deny the allegations of paragraph 253 and accordingly denies the same.

254. API lacks sufficient information to confirm or deny the allegations of paragraph 254 and accordingly denies the same.

255. API lacks sufficient information to confirm or deny the allegations of paragraph 255 and accordingly denies the same.

256. API lacks sufficient information to confirm or deny the allegations of paragraph 256 and accordingly denies the same.

257. API denies the allegations of paragraph 257 of the Complaint.

258. API denies the allegations of paragraph 258 of the Complaint.

259. API denies the allegations of paragraph 259 of the Complaint.

COUNT TEN – INFRINGEMENT OF U.S. PATENT NO. 7,293,321

260. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

261. API admits a copy of the '321 patent was attached as Exhibit J to the Amended Complaint. API admits that, on its face, the '321 patent lists an issue date of November 13, 2007.

API lacks sufficient information to confirm or deny the remaining allegations of paragraph 261 and accordingly denies the same.

262. API lacks sufficient information to confirm or deny the allegations of paragraph 262 and accordingly denies the same.

263. API lacks sufficient information to confirm or deny the allegations of paragraph 263 and accordingly denies the same.

264. API lacks sufficient information to confirm or deny the allegations of paragraph 264 and accordingly denies the same.

265. API lacks sufficient information to confirm or deny the allegations of paragraph 265 and accordingly denies the same.

266. API denies the allegations of paragraph 266 of the Complaint.

267. API denies the allegations of paragraph 267 of the Complaint.

268. API denies the allegations of paragraph 268 of the Complaint.

269. API denies the allegations of paragraph 269 of the Complaint.

270. API denies the allegations of paragraph 270 of the Complaint.

271. API denies the allegations of paragraph 271 of the Complaint.

272. API denies the allegations of paragraph 272 of the Complaint.

273. API denies the allegations of paragraph 273 of the Complaint.

274. API denies the allegations of paragraph 274 of the Complaint.

275. API lacks sufficient information to confirm or deny the allegations of paragraph 275 and accordingly denies the same.

276. API lacks sufficient information to confirm or deny the allegations of paragraph 276 and accordingly denies the same.

277. API lacks sufficient information to confirm or deny the allegations of paragraph 277 and accordingly denies the same.

278. API lacks sufficient information to confirm or deny the allegations of paragraph 278 and accordingly denies the same.

279. API lacks sufficient information to confirm or deny the allegations of paragraph 279 and accordingly denies the same.

280. API lacks sufficient information to confirm or deny the allegations of paragraph 280 and accordingly denies the same.

281. API lacks sufficient information to confirm or deny the allegations of paragraph 281 and accordingly denies the same.

282. API lacks sufficient information to confirm or deny the allegations of paragraph 282 and accordingly denies the same.

283. API lacks sufficient information to confirm or deny the allegations of paragraph 283 and accordingly denies the same.

284. API lacks sufficient information to confirm or deny the allegations of paragraph 284 and accordingly denies the same.

285. API lacks sufficient information to confirm or deny the allegations of paragraph 285 and accordingly denies the same.

286. API denies the allegations of paragraph 286 of the Complaint.

287. API denies the allegations of paragraph 287 of the Complaint.

288. API denies the allegations of paragraph 288 of the Complaint.

COUNT ELEVEN – INFRINGEMENT OF U.S. PATENT NO. 7,523,520

289. The statements and denials of paragraphs 2 through 21 of this Answer are

incorporated by reference as if set forth herein.

290. API admits a copy of the '520 patent was attached as Exhibit K to the Amended Complaint. API admits that, on its face, the '520 patent lists an issue date of April 28, 2009. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 290 and accordingly denies the same.

291. API lacks sufficient information to confirm or deny the allegations of paragraph 291 and accordingly denies the same.

292. API lacks sufficient information to confirm or deny the allegations of paragraph 292 and accordingly denies the same.

293. API lacks sufficient information to confirm or deny the allegations of paragraph 293 and accordingly denies the same.

294. API lacks sufficient information to confirm or deny the allegations of paragraph 294 and accordingly denies the same.

295. API denies the allegations of paragraph 295 of the Complaint.

296. API denies the allegations of paragraph 296 of the Complaint.

297. API denies the allegations of paragraph 297 of the Complaint.

298. API denies the allegations of paragraph 298 of the Complaint.

299. API denies the allegations of paragraph 299 of the Complaint.

300. API denies the allegations of paragraph 300 of the Complaint.

301. API denies the allegations of paragraph 301 of the Complaint.

302. API denies the allegations of paragraph 302 of the Complaint.

303. API denies the allegations of paragraph 303 of the Complaint.

304. API lacks sufficient information to confirm or deny the allegations of paragraph

304 and accordingly denies the same.

305. API lacks sufficient information to confirm or deny the allegations of paragraph 305 and accordingly denies the same.

306. API lacks sufficient information to confirm or deny the allegations of paragraph 306 and accordingly denies the same.

307. API lacks sufficient information to confirm or deny the allegations of paragraph 307 and accordingly denies the same.

308. API lacks sufficient information to confirm or deny the allegations of paragraph 308 and accordingly denies the same.

309. API lacks sufficient information to confirm or deny the allegations of paragraph 309 and accordingly denies the same.

310. API lacks sufficient information to confirm or deny the allegations of paragraph 310 and accordingly denies the same.

311. API lacks sufficient information to confirm or deny the allegations of paragraph 311 and accordingly denies the same.

312. API lacks sufficient information to confirm or deny the allegations of paragraph 312 and accordingly denies the same.

313. API lacks sufficient information to confirm or deny the allegations of paragraph 313 and accordingly denies the same.

314. API lacks sufficient information to confirm or deny the allegations of paragraph 314 and accordingly denies the same.

315. API denies the allegations of paragraph 315 of the Complaint.

316. API denies the allegations of paragraph 316 of the Complaint.

317. API denies the allegations of paragraph 317 of the Complaint.

COUNT TWELVE – INFRINGEMENT OF U.S. PATENT NO. 7,484,264

318. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

319. API admits a copy of the ‘264 patent was attached as Exhibit L to the Complaint. API admits that, on its face, the ‘264 patent lists an issue date of February 3, 2009. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 319 and accordingly denies the same.

320. API lacks sufficient information to confirm or deny the allegations of paragraph 320 and accordingly denies the same.

321. API lacks sufficient information to confirm or deny the allegations of paragraph 321 and accordingly denies the same.

322. API lacks sufficient information to confirm or deny the allegations of paragraph 322 and accordingly denies the same.

323. API lacks sufficient information to confirm or deny the allegations of paragraph 323 and accordingly denies the same.

324. API denies the allegations of paragraph 324 of the Complaint.

325. API denies the allegations of paragraph 325 of the Complaint.

326. API denies the allegations of paragraph 326 of the Complaint.

327. API denies the allegations of paragraph 327 of the Complaint.

328. API denies the allegations of paragraph 328 of the Complaint.

329. API denies the allegations of paragraph 329 of the Complaint.

330. API denies the allegations of paragraph 330 of the Complaint.

331. API denies the allegations of paragraph 331 of the Complaint.

332. API denies the allegations of paragraph 332 of the Complaint.

333. API lacks sufficient information to confirm or deny the allegations of paragraph 333 and accordingly denies the same.

334. API lacks sufficient information to confirm or deny the allegations of paragraph 334 and accordingly denies the same.

335. API lacks sufficient information to confirm or deny the allegations of paragraph 335 and accordingly denies the same.

336. API lacks sufficient information to confirm or deny the allegations of paragraph 336 and accordingly denies the same.

337. API lacks sufficient information to confirm or deny the allegations of paragraph 337 and accordingly denies the same.

338. API lacks sufficient information to confirm or deny the allegations of paragraph 338 and accordingly denies the same.

339. API lacks sufficient information to confirm or deny the allegations of paragraph 339 and accordingly denies the same.

340. API lacks sufficient information to confirm or deny the allegations of paragraph 340 and accordingly denies the same.

341. API lacks sufficient information to confirm or deny the allegations of paragraph 341 and accordingly denies the same.

342. API lacks sufficient information to confirm or deny the allegations of paragraph 342 and accordingly denies the same.

343. API lacks sufficient information to confirm or deny the allegations of paragraph

343 and accordingly denies the same.

344. API denies the allegations of paragraph 344 of the Complaint.

345. API denies the allegations of paragraph 345 of the Complaint.

346. API denies the allegations of paragraph 346 of the Complaint.

COUNT THIRTEEN – INFRINGEMENT OF U.S. PATENT NO. 8,099,823

347. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

348. API admits a copy of the '823 patent was attached as Exhibit M to the Amended Complaint. API admits that, on its face, the '823 patent lists an issue date of January 24, 2012. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 348 and accordingly denies the same.

349. API lacks sufficient information to confirm or deny the allegations of paragraph 349 and accordingly denies the same.

350. API lacks sufficient information to confirm or deny the allegations of paragraph 350 and accordingly denies the same.

351. API lacks sufficient information to confirm or deny the allegations of paragraph 351 and accordingly denies the same.

352. API lacks sufficient information to confirm or deny the allegations of paragraph 352 and accordingly denies the same.

353. API denies the allegations of paragraph 353 of the Complaint.

354. API denies the allegations of paragraph 354 of the Complaint.

355. API denies the allegations of paragraph 355 of the Complaint.

356. API denies the allegations of paragraph 356 of the Complaint.

357. API denies the allegations of paragraph 357 of the Complaint.

358. API denies the allegations of paragraph 358 of the Complaint.

359. API denies the allegations of paragraph 359 of the Complaint.

360. API denies the allegations of paragraph 360 of the Complaint.

361. API denies the allegations of paragraph 361 of the Complaint.

362. API lacks sufficient information to confirm or deny the allegations of paragraph 362 and accordingly denies the same.

363. API lacks sufficient information to confirm or deny the allegations of paragraph 363 and accordingly denies the same.

364. API lacks sufficient information to confirm or deny the allegations of paragraph 364 and accordingly denies the same.

365. API lacks sufficient information to confirm or deny the allegations of paragraph 365 and accordingly denies the same.

366. API lacks sufficient information to confirm or deny the allegations of paragraph 366 and accordingly denies the same.

367. API lacks sufficient information to confirm or deny the allegations of paragraph 367 and accordingly denies the same.

368. API lacks sufficient information to confirm or deny the allegations of paragraph 368 and accordingly denies the same.

369. API lacks sufficient information to confirm or deny the allegations of paragraph 369 and accordingly denies the same.

370. API denies the allegations of paragraph 370 of the Complaint.

371. API denies the allegations of paragraph 371 of the Complaint.

372. API denies the allegations of paragraph 372 of the Complaint.

COUNT FOURTEEN – INFRINGEMENT OF U.S. PATENT NO. 6,292,974

373. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

374. API admits a copy of the '974 patent was attached as Exhibit N to the Complaint. API admits that, on its face, the '974 patent lists an issue date of September 25, 2001. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 374 and accordingly denies the same.

375. API lacks sufficient information to confirm or deny the allegations of paragraph 375 and accordingly denies the same.

376. API lacks sufficient information to confirm or deny the allegations of paragraph 376 and accordingly denies the same.

377. API lacks sufficient information to confirm or deny the allegations of paragraph 377 and accordingly denies the same.

378. API lacks sufficient information to confirm or deny the allegations of paragraph 378 and accordingly denies the same.

379. API denies the allegations of paragraph 379 of the Complaint.

380. API denies the allegations of paragraph 380 of the Complaint.

381. API denies the allegations of paragraph 381 of the Complaint.

382. API denies the allegations of paragraph 382 of the Complaint.

383. API denies the allegations of paragraph 383 of the Complaint.

384. API denies the allegations of paragraph 384 of the Complaint.

385. API denies the allegations of paragraph 385 of the Complaint.

386. API denies the allegations of paragraph 386 of the Complaint.

387. API denies the allegations of paragraph 387 of the Complaint.

388. API lacks sufficient information to confirm or deny the allegations of paragraph 388 and accordingly denies the same.

389. API lacks sufficient information to confirm or deny the allegations of paragraph 389 and accordingly denies the same.

390. API lacks sufficient information to confirm or deny the allegations of paragraph 390 and accordingly denies the same.

391. API lacks sufficient information to confirm or deny the allegations of paragraph 391 and accordingly denies the same.

392. API lacks sufficient information to confirm or deny the allegations of paragraph 392 and accordingly denies the same.

393. API lacks sufficient information to confirm or deny the allegations of paragraph 393 and accordingly denies the same.

394. API lacks sufficient information to confirm or deny the allegations of paragraph 394 and accordingly denies the same.

395. API lacks sufficient information to confirm or deny the allegations of paragraph 395 and accordingly denies the same.

396. API denies the allegations of paragraph 396 of the Complaint.

397. API denies the allegations of paragraph 397 of the Complaint.

398. API denies the allegations of paragraph 398 of the Complaint.

COUNT FIFTEEN – INFRINGEMENT OF U.S. PATENT NO. 6,668,419

399. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

400. API admits a copy of the '419 patent was attached as Exhibit O to the Complaint. API admits that, on its face, the '419 patent lists an issue date of December 30, 2003. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 400 and accordingly denies the same.

401. API lacks sufficient information to confirm or deny the allegations of paragraph 401 and accordingly denies the same.

402. API lacks sufficient information to confirm or deny the allegations of paragraph 402 and accordingly denies the same.

403. API lacks sufficient information to confirm or deny the allegations of paragraph 403 and accordingly denies the same.

404. API lacks sufficient information to confirm or deny the allegations of paragraph 404 and accordingly denies the same.

405. API lacks sufficient information to confirm or deny the allegations of paragraph 405 and accordingly denies the same.

406. API lacks sufficient information to confirm or deny the allegations of paragraph 406 and accordingly denies the same.

COUNT SIXTEEN – INFRINGEMENT OF U.S. PATENT NO. 7,941,891

407. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

408. API admits a copy of the '891 patent was attached as Exhibit P to the Complaint. API admits that, on its face, the '891 patent lists an issue date of May 17, 2011. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 408 and accordingly denies the same.

409. API lacks sufficient information to confirm or deny the allegations of paragraph 409 and accordingly denies the same.

410. API lacks sufficient information to confirm or deny the allegations of paragraph 410 and accordingly denies the same.

411. API lacks sufficient information to confirm or deny the allegations of paragraph 411 and accordingly denies the same.

412. API lacks sufficient information to confirm or deny the allegations of paragraph 412 and accordingly denies the same.

413. API lacks sufficient information to confirm or deny the allegations of paragraph 413 and accordingly denies the same.

414. API lacks sufficient information to confirm or deny the allegations of paragraph 414 and accordingly denies the same.

COUNT SEVENTEEN – INFRINGEMENT OF U.S. PATENT NO. 8,544,136

415. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

416. API admits a copy of the '136 patent was attached as Exhibit Q to the Complaint. API admits that, on its face, the '136 patent lists an issue date of October 1, 2013. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 416 and accordingly denies the same.

417. API lacks sufficient information to confirm or deny the allegations of paragraph 417 and accordingly denies the same.

418. API lacks sufficient information to confirm or deny the allegations of paragraph 418 and accordingly denies the same.

419. API lacks sufficient information to confirm or deny the allegations of paragraph 419 and accordingly denies the same.

420. API lacks sufficient information to confirm or deny the allegations of paragraph 420 and accordingly denies the same.

421. API lacks sufficient information to confirm or deny the allegations of paragraph 421 and accordingly denies the same.

422. API lacks sufficient information to confirm or deny the allegations of paragraph 422 and accordingly denies the same.

COUNT EIGHTEEN – INFRINGEMENT OF U.S. PATENT NO. 8,272,096

423. The statements and denials of paragraphs 2 through 21 of this Answer are incorporated by reference as if set forth herein.

424. API admits a copy of the '096 patent was attached as Exhibit R to the Complaint. API admits that, on its face, the '096 patent lists an issue date of September 25, 2012. API lacks sufficient information to confirm or deny the remaining allegations of paragraph 424 and accordingly denies the same.

425. API lacks sufficient information to confirm or deny the allegations of paragraph 425 and accordingly denies the same.

426. API lacks sufficient information to confirm or deny the allegations of paragraph 426 and accordingly denies the same.

427. API lacks sufficient information to confirm or deny the allegations of paragraph 427 and accordingly denies the same.

428. API lacks sufficient information to confirm or deny the allegations of paragraph 428 and accordingly denies the same.

429. API lacks sufficient information to confirm or deny the allegations of paragraph 429 and accordingly denies the same.

430. API lacks sufficient information to confirm or deny the allegations of paragraph 430 and accordingly denies the same.

431. API denies the allegations of paragraph 431 of the Complaint.

432. API lacks sufficient information to confirm or deny the allegations of paragraph 432 and accordingly denies the same.

433. API lacks sufficient information to confirm or deny the allegations of paragraph 433 and accordingly denies the same.

434. API lacks sufficient information to confirm or deny the allegations of paragraph 434 and accordingly denies the same.

435. API lacks sufficient information to confirm or deny the allegations of paragraph 435 and accordingly denies the same.

436. API lacks sufficient information to confirm or deny the allegations of paragraph 436 and accordingly denies the same.

437. API lacks sufficient information to confirm or deny the allegations of paragraph 437 and accordingly denies the same.

WILLFULNESS

438. API denies the allegations of paragraph 438 of the Complaint.

PRAYER FOR RELIEF

API denies Bosch is entitled to any of the relief recited in the PRAYER FOR RELIEF. API denies all allegations not specifically admitted.

AFFIRMATIVE DEFENSES

API's Affirmative Defenses are listed below. API reserves the right to amend its Answer

to add additional Affirmative Defenses, including instances of inequitable conduct, consistent with the facts discovered in the case.

FIRST AFFIRMATIVE DEFENSE

API does not infringe and has not infringed any claim of the '218, '111, '607, '988, '434, '926, '905, '698, '588, '321, '520, '264, '823, '974, '419, '891, '136 and '096 patents under any theory, including directly (whether individually or jointly), indirectly (whether contributorily or by active inducement), literally, or under the doctrine of equivalents.

SECOND AFFIRMATIVE DEFENSE

The '218, '111, '607, '988, '434, '926, '905, '698, '588, '321, '520, '264, '823, '974, '419, '891, '136 and '096 patents are invalid because the alleged invention fails to satisfy the conditions for patentability specified in 35 U.S.C §100 *et seq.*, including without limitation one or more requirements of 35 U.S.C. §101, 102, 103 and/or 112.

THIRD AFFIRMATIVE DEFENSE

Bosch's attempted enforcement of its patents against API is barred by equitable estoppel.

FOURTH AFFIRMATIVE DEFENSE

Bosch is barred by 35 U.S.C. §288 from recovering costs associated with its action.

FIFTH AFFIRMATIVE DEFENSE

Upon information and belief, Bosch's claims for damages for purported patent infringement are limited by 35 U.S.C. §§286 and 287.

SIXTH AFFIRMATIVE DEFENSE

Bosch is not entitled to injunctive relief because any alleged injury to Bosch is neither immediate nor irreparable, and should Bosch prevail in this action, Bosch has an adequate

remedy at law.

SEVENTH AFFIRMATIVE DEFENSE

Bosch's purported claims for damages and other relief resulting from alleged infringement of claims that are the result of API's actions in conjunction with the actions of other parties, which API specifically denies, are barred to the extent that those other parties are licensed to practice the claims of the patents and/or are released from past claims of infringement of the claims of the patents.

EIGHTH AFFIRMATIVE DEFENSE

Bosch's claims are barred, in whole or in part, by the doctrine of exhaustion.

NINTH AFFIRMATIVE DEFENSE

Bosch's claims are barred, in whole or part, by the doctrine of permissible repair.

CONDITIONAL COUNTERCLAIMS

Should the Court find that it has personal jurisdiction over API in this matter, API, by and through its counsel, hereby asserts the following conditional counterclaims against Bosch:

1. Counterclaim Plaintiff API Korea Co., Ltd is a corporation organized under the laws of Korea with a principal place of business in Incheon, Korea.
2. On information and belief, Counterclaim Defendant Robert Bosch LLC is an Illinois Corporation with its principal place of business in Illinois.
3. These counterclaims arise under the patent laws of the United States, Title 35, United States Code. The jurisdiction of this Court is proper under at least 35 U.S.C. § 271 et seq. and 28 U.S.C. §§ 1331, 1338, and 2201-02.
4. Venue is proper in this District pursuant to at least 28 U.S.C. §§1391 and 1400.

FIRST COUNTERCLAIM **(Declaratory Relief Regarding Non-Infringement)**

5. Based on Bosch's filing of this action and API's affirmative defenses, an actual controversy has arisen and now exists between the parties as to whether API infringes the '218, '111, '607, '988, '434, '926, '905, '698, '588, '321, '520, '264, '823, '974, '419, '891, '136 and '096 patents.

6. Pursuant to the Federal Declaratory Judgment Act, 28 U.S.C. §2201 et seq., API requests a declaration by the Court that it does not infringe any claim of the '218, '111, '607, '988, '434, '926, '905, '698, '588, '321, '520, '264, '823, '974, '419, '891, '136 and '096 patents under any theory, including directly (whether individually or jointly), indirectly (whether contributorily or by inducement), literally, or under the doctrine of equivalents.

SECOND COUNTERCLAIM
(Declaratory Relief Regarding Invalidity)

7. The allegations contained in the preceding paragraphs 1-6 of these Counterclaims are incorporated and realleged as if fully set forth herein.

8. Based on Bosch's filing of this action and API's Third Affirmative Defenses, an actual controversy has arisen and now exists between the parties as to whether API's infringes the '218, '111, '607, '988, '434, '926, '905, '698, '588, '321, '520, '264, '823, '974, '419, '891, '136 and '096 patents.

9. Pursuant to the Federal Declaratory Judgment Act, 28 U.S.C. §2201 et seq. and 35 U.S.C. §100 et seq., API requests a declaration by the Court that the '218, '111, '607, '988, '434, '926, '905, '698, '588, '321, '520, '264, '823, '974, '419, '891, '136 and '096 patents are invalid.

PRAYER FOR RELIEF AND DEMAND FOR JUDGMENT

WHEREFORE, API respectfully requests judgment in its favor, including the following relief from Bosch:

A. Dismissal of all of Plaintiff's claims against API, in their entirety and with prejudice.

B. A declaration that API does not infringe and has not infringed any valid claim of any of the '218, '111, '607, '988, '434, '926, '905, '698, '588, '321, '520, '264, '823, '974, '419, '891, '136 and '096 patents, whether directly or indirectly, literally, or under the doctrine of equivalents.

C. A declaration that the claims of the '218, '111, '607, '988, '434, '926, '905, '698, '588, '321, '520, '264, '823, '974, '419, '891, '136 and '096 patents are invalid.

D. An order finding this an exceptional case under 35 U.S.C §285, and awarding API its costs and fees in this action, including attorneys' fees, and pre-judgment interest thereon.

E. An order awarding API any other such relief as this Court deems just and proper.

JURY DEMAND

API demands a trial by jury.

Dated: November 17, 2014

O'KELLY ERNST & BIELLI, LLC

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