

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

CANON INC.,	)	
	)	Case No. 22-cv-2057-JWB-JFD
Plaintiff,	)	
	)	<b>PLAINTIFF CANON INC.’S</b>
vs.	)	<b>ANSWER TO DEFENDANT</b>
	)	<b>GENERAL PLASTIC</b>
KATUN CORPORATION and GENERAL	)	<b>INDUSTRIAL CO. LTD.’S</b>
PLASTIC INDUSTRIAL CO. LTD.,	)	<b>COUNTERCLAIMS</b>
	)	
Defendants.	)	<b>JURY TRIAL DEMANDED</b>

Pursuant to Federal Rules of Civil Procedure 7 and 12, Plaintiff and Counterclaim Defendant Canon Inc. (“Canon”) hereby answers Defendant General Plastic Industrial Co. Ltd.’s (“GPI”) counterclaims as follows:

**Parties**

1. Upon information and belief, Canon admits the allegations of counterclaim paragraph 1.
2. Canon admits that it is a corporation organized and existing under the laws of Japan, having its principal place of business at 30-2, Shimomaruko 3- chome, Ohta-ku, Tokyo 146-8501, Japan.
3. Canon admits that GPI’s counterclaims purport to seek declarations of invalidity and non-infringement with respect to U.S. Patent No. 11,392,056 (“the ’056 patent”).
4. Canon admits that, for purposes of this lawsuit only, jurisdiction is proper.

5. Canon admits that, for purposes of this lawsuit only, this Court has personal jurisdiction over Canon.

6. Canon admits that, for the purposes of this lawsuit only, venue is proper.

**General Allegations**

7. Canon admits that on August 22, 2022, Canon filed suit against GPI asserting infringement of the '056 patent.

8. The allegations in paragraph 8 constitute conclusions of law, legal arguments, or statements of intent to which no response is necessary. To the extent a response is deemed necessary Canon denies that the '056 patent is invalid under one or more of 35 U.S.C. §§ 101, 102, 103, and 112.

**First Counterclaim**

**(Declaration of Invalidity of U.S. Patent No. 11,392,056)**

9. Canon repeats and incorporates by reference each of the responses in paragraphs 1-8 above, as though set forth here in their entirety.

10. Canon admits that an actual controversy exists between GPI and Canon concerning the validity of the '056 patent.

11. Denied.

**Second Counterclaim**

**(Declaration of Non-infringement of U.S. Patent No. 11,392,056)**

12. Canon repeats and incorporates by reference each of the responses in paragraphs 1-11 above, as though set forth here in their entirety.

13. Canon admits that an actual controversy exists between GPI and Canon concerning GPI's infringement of the '056 patent.

14. Denied.

**Request for Relief**

Although no response to GPI's Request for Relief is required, Canon states that no basis exists in law or equity for any of the relief requested therein.

WHEREFORE, Canon prays for judgment and relief as follows:

- A. In favor of Canon and against GPI on GPI's counterclaims;
- B. In accordance with all of the relief requested by Canon in its Complaint;

and

- C. That Canon be granted such other and additional relief as the Court deems equitable, just, and proper.

**Jury Demand**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Canon demands a jury trial on all issues so triable.

Dated: February 21, 2022

DORSEY & WHITNEY LLP

By s/ Shannon L. Bjorklund

Shannon L. Bjorklund (#0389932)  
50 South Sixth Street, Suite 1500  
Minneapolis, MN 55402  
Telephone: (612) 340-2600  
bjorklund.shannon@dorsey.com

Of Counsel:

Michael P. Sandonato  
VENABLE LLP  
2049 Century Park East, Suite 2300  
Los Angeles, CA 90067  
T 310.229.9900 | F 310.229.9901  
msandonato@venable.com

Edmund J. Haughey  
VENABLE LLP  
600 Massachusetts Avenue, NW  
Washington, DC 20001  
T 202.344.4000 | F 202.344.8300  
ehaughey@venable.com

Dennis J. McMahon  
Nicholas Marcello  
VENABLE LLP  
Rockefeller Center  
1270 Avenue of the Americas, 24<sup>th</sup> Floor  
New York, NY 10020  
T 212.307.5500 | F 212.307.5598  
dcmahon@venable.com  
ndmarcello@venable.com

*Attorneys for Plaintiff Canon Inc.*