

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

STORMSEAL USA, LLC and SYSTEM
STORMSEAL PTY LTD.,

Plaintiffs,

v.

SRS DISTRIBUTION INC.,

Defendant.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 2:23-cv-391

JURY TRIAL DEMANDED

**DEFENDANT SRS DISTRIBUTION INC.'S ANSWER, AFFIRMATIVE DEFENSES,
AND COUNTERCLAIMS TO PLAINTIFFS STORMSEAL USA, LLC AND SYSTEM
STORMSEAL PTY LTD.'S COMPLAINT FOR PATENT INFRINGEMENT**

Defendant SRS Distribution Inc. (“Defendant” or “SRS”) files its Answer, Affirmative Defenses, and Counterclaims to Plaintiffs Stormseal USA, LLC and Stormseal Pty Ltd.’s (collectively, “Plaintiffs” or “Stormseal”) Complaint filed on August 29, 2023 (Dkt. No. 1) (“Complaint”). SRS denies that it is liable for infringement of any valid claim of U.S. Patent No. 11,168,484 (“the ’484 Patent”).

Each numbered paragraph below corresponds to the same-numbered paragraph (each a “Paragraph”) in Stormseal’s Complaint. SRS denies all allegations, whether express or implied, that are not specifically admitted below. Any factual allegation below is admitted only as to the specific admitted facts, not as to any purported conclusions, characterizations, implications, or speculations that arguably follow from the admitted facts. SRS denies that Stormseal is entitled to the relief requested or any other relief. SRS responds to Stormseal’s Complaint as follows:

