

UNITED STATES DISTRICT COURT
for the
District of Massachusetts

Case No. 1:11-cv-10802-WGY

LIBERTY MEDIA HOLDINGS, LLC)
Plaintiff)
)
v)
)
SWARM SHARING HASH FILE ET AL)
Defendants)
)

ANSWER OF LARRY SON TO PLAINTIFF'S COMPLAINT

1. The statement indicated in this paragraph does not assert a fact, it is a statement as to Plaintiffs own legal actions, and therefore no response is necessary.
2. Identification of Plaintiff to which no response is necessary.
3. Denied.
4. Defendant does not have sufficient knowledge to either admit or deny this statement.
5. Defendant does not have sufficient knowledge to either admit or deny this statement.
6. Defendant does not have sufficient knowledge to either admit or deny this statement.
7. Defendant does not have sufficient knowledge to either admit or deny this statement.
8. Defendant does not have sufficient knowledge to either admit or deny this statement.
9. Defendant does not have sufficient knowledge to either admit or deny this statement.
10. Identification of Plaintiff to which no response is necessary.
11. Denied.
12. Defendant does not have sufficient knowledge to either admit or deny this statement.
13. Defendant does not have sufficient knowledge to either admit or deny this statement.
14. Defendant does not have sufficient knowledge to either admit or deny this statement.
15. Defendant does not have sufficient knowledge to either admit or deny this statement.
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37. Defendant does not have sufficient knowledge to either admit or deny this statement.
38. Defendant does not have sufficient knowledge to either admit or deny this statement.
39. Defendant does not have sufficient knowledge to either admit or deny this statement.
40. Denied.
41. Denied.
42. Defendant does not have sufficient knowledge to either admit or deny this statement.
43. Defendant does not have sufficient knowledge to either admit or deny this statement.
44. Defendant does not have sufficient knowledge to either admit or deny this statement.
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53. Defendant does not have sufficient knowledge to either admit or deny this statement.
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55. Defendant does not have sufficient knowledge to either admit or deny this statement.
56. Defendant does not have sufficient knowledge to either admit or deny this statement.
57. Defendant does not have sufficient knowledge to either admit or deny this statement.
58. Denied.
59. Denied.
60. Denied.
61. Denied.
62. Denied.
63. Defendant does not have sufficient knowledge to either admit or deny this statement.
64. Denied.
65. Denied.
66. Denied.
67. Denied.
68. Denied.
69. Denied.
70. Denied.
71. This statement does not require a response from the Defendant, Larry Son.
72. Defendant does not have sufficient knowledge to either admit or deny this statement.
73. Defendant does not have sufficient knowledge to either admit or deny this statement.
74. Defendant does not have sufficient knowledge to either admit or deny this statement.
75. Defendant does not have sufficient knowledge to either admit or deny this statement.
76. Denied.
77. Denied.

WHEREFORE, the Defendant, Larry Son, respectfully requests that this action be dismissed.

78. This statement does not require a response from the Defendant, Larry Son.
79. Defendant does not have sufficient knowledge to either admit or deny this statement.
80. Defendant does not have sufficient knowledge to either admit or deny this statement.
81. Denied.

82. Denied.
83. Denied.
84. Defendant does not have sufficient knowledge to either admit or deny this statement.
85. Denied.
86. Denied.
87. Denied.
88. Denied.

WHEREFORE, the Defendant, Larry Son, respectfully requests that this action be dismissed.

89. This statement does not require a response from the Defendant, Larry Son.
90. Denied.
91. Defendant does not have sufficient knowledge to either admit or deny this statement.
92. Defendant does not have sufficient knowledge to either admit or deny this statement.
93. Defendant does not have sufficient knowledge to either admit or deny this statement.
94. Defendant does not have sufficient knowledge to either admit or deny this statement.
95. Defendant does not have sufficient knowledge to either admit or deny this statement.
96. Defendant does not have sufficient knowledge to either admit or deny this statement.
97. Denied.
98. Denied.
99. Denied.
100. Denied.
101. Defendant does not have sufficient knowledge to either admit or deny this statement.
102. Denied.
103. Denied.
104. Denied.
105. Denied.
106. Denied.
107. Denied.
108. Denied.
109. Denied.
110. Denied.

111. Denied.

WHEREFORE, the Defendant, Larry Son, respectfully requests that this action be dismissed.

112. This statement does not require a response from the Defendant, Larry Son.

113. Denied.

114. Denied.

115. Denied.

116. Denied.

117. Denied.

118. Denied.

119. Denied.

WHEREFORE, the Defendant, Larry Son, respectfully requests that this action be dismissed.

120. This statement does not require a response from the Defendant, Larry Son.

121. This statement does not require a response from the Defendant, Larry Son.

122. This statement does not require a response from the Defendant, Larry Son.

123. This statement does not require a response from the Defendant, Larry Son.

124. This statement does not require a response from the Defendant, Larry Son.

WHEREFORE, the Defendant, Larry Son, respectfully requests that this action be dismissed.

AFFIRMATIVE DEFENSES

FIRST DEFENSE:

By way of affirmative defense, the Defendant, Larry Son, denies each and every material allegation of the Complaint which has not specifically been admitted, denied, or controverted.

SECOND DEFENSE:

By way of affirmative defense, the Defendant, Larry Son, states that the Complaint fails to set forth a claim upon which relief can be granted, and thus must be dismissed.

THIRD DEFENSE:

By way of affirmative defense, the Defendant, Larry Son, states that if the Plaintiff sustained damages, as alleged, which the Defendant denies, such damage were caused by someone for whose conduct the Defendant was not and is not legally responsible or answerable.

FOURTH DEFENSE:

By way of affirmative defense, the Defendant, Larry Son, states that all claims raised by Plaintiff are barred from recovery by the applicable statute of limitations.

FIFTH DEFENSE:

By way of affirmative defense, the Defendant, Larry Son, states that all claims raised by Plaintiff are barred from recovery by virtue of the doctrine of estoppel.

SIXTH DEFENSE:

By way of affirmative defense, the Defendant, Larry Son, states that all claims raised by Plaintiff are barred from recovery by its own fraud and misrepresentations.

SEVENTH DEFENSE:

The Defendants state that Plaintiffs' right to recover from the Defendants are barred by the "Clean Hands" Doctrine.

EIGHTH DEFENSE:

By way of affirmative defense, the Defendant, Larry Son, states that if the Complaint must be dismissed as the Court is without jurisdiction.

NINTH DEFENSE:

The Defendants state that Plaintiffs' right to recover from the Defendants are barred by doctrine of laches.

TENTH DEFENSE:

The claims arising out of the subject matter of the transactions and occurrences alleged are barred by their falsity.

ELEVENTH DEFENSE:

The Defendants state that the damages alleged in the Plaintiff's Complaint were caused in whole or in part by the actions of the Plaintiff, and therefore, the Plaintiff cannot recover or prevail on the Plaintiff's Complaint.

TWELTH DEFENSE:

The Defendants state that the Plaintiff, by their conduct and actions and/or the conduct and actions of its agents and servants, has waived any and all rights it may have had against the Defendants, and therefore, the Plaintiff cannot recover or prevail on the Plaintiff's Complaint.

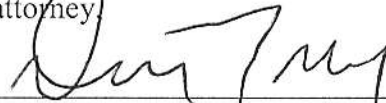
THIRTEENTH DEFENSE:

The Defendant, Larry Son, hereby gives notice that it intends to rely upon such other and further defenses as may become available or apparent during discovery proceedings or investigations and hereby reserves the right to amend its answer to assert any such defense.

WIIEREFORE, Defendants request that the court dismiss all of the claims set forth in Plaintiff's complaint and enter judgment for Defendants together with costs, attorney's fees, and such other and further relief as the court deems just and proper.

The Defendant,
Larry Son

Respectfully submitted, by his
attorney



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Date: February 13, 2012

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Plaintiff)
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v)
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Defendants)
)

CERTIFICATE OF SERVICE

I, Dan N. Tran, counsel for Defendant, Larry Son, hereby certify that on February 13, 2012, a copy of the foregoing, *Answer*, together with all documentary exhibits, filed through the ECF system was sent electronically to the registered participants as identified on the Notice of Electronic Filing at the time of filing.

Respectfully submitted,



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Date: February 13, 2012