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9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA

11 RIOT GAMES, INC., et al.,

12 Plaintiff,

13 v.

14 CAMERON SANTOS, et al.,

15 Defendants.

Case No. 2:21-cv-195-MCS (ASx)

**ANSWER TO COMPLAINT**

**DEMAND FOR JURY TRIAL**

16 Cameron Santos (“Defendant”) by and through undersigned counsel, hereby  
17 answers the allegations in Plaintiffs’ complaint as follows Any allegations not  
18 expressly admitted are denied, and:

19 1. Defendant is without information sufficient to admit or deny the  
20 allegations of Paragraph 1 of the Complaint.

21 2. Denied.

22 3. Denied.

23 4. Paragraph 4 of the Complaint states only legal conclusions to which  
24 no response is required. To the extent any response is required, Defendant denies  
25 said allegations.

26 5. Paragraph 5 of the Complaint states only a legal conclusion to which  
27 no response is required. To the extent any response is required, Defendant admits  
28 the Complaint purports to seek relief stated in this paragraph and denies Plaintiffs

1 are entitled to any such relief.

2 6. Paragraph 6 of the Complaint states only a legal conclusion to which  
3 no response is required.

4 7. Denied.

5 a. Denied.

6 b. Denied.

7 c. Denied.

8 d. Denied.

9 e. Defendant is without sufficient information sufficient to admit  
10 where Riot is located or has its principal place of business and otherwise denies the  
11 allegations of paragraph 7.e of the Complaint.

12 8. Denied.

13 9. Defendant is without sufficient information sufficient to admit or deny  
14 the allegations of Paragraph 9 of the Complaint.

15 10. Defendant is without sufficient information sufficient to admit or deny  
16 the allegations of Paragraph 10 if the Complaint.

17 11. Defendant admits that he is an individual resident residing in  
18 Albuquerque, New Mexico. Defendant denies the remaining allegations in  
19 paragraph 11 of the Complaint.

20 12. Defendant is without sufficient information sufficient to admit or deny  
21 the allegations of Paragraph 12 if the Complaint.

22 13. Defendant is without sufficient information sufficient to admit or deny  
23 the allegations of Paragraph 13 if the Complaint.

24 14. Denied.

25 15. Defendant is without sufficient information sufficient to admit or deny  
26 the allegations of Paragraph 15 if the Complaint.

27 16. Defendant is without sufficient information sufficient to admit or deny  
28 the allegations of Paragraph 16 if the Complaint.

1           21. Defendant is without sufficient information sufficient to admit or deny  
2 the allegations of Paragraph 17 if the Complaint.

3           22. Defendant is without sufficient information sufficient to admit or deny  
4 the allegations of Paragraph 18 if the Complaint.

5           23. Defendant is without sufficient information sufficient to admit or deny  
6 the allegations of Paragraph 19 if the Complaint.

7           24. Defendant is without sufficient information sufficient to admit or deny  
8 the allegations of Paragraph 20 if the Complaint.

9           25. Defendant is without sufficient information sufficient to admit or deny  
10 the allegations of Paragraph 21 if the Complaint.

11           26. Defendant is without sufficient information sufficient to admit or deny  
12 the allegations of Paragraph 22 if the Complaint.

13           27. Defendant is without sufficient information sufficient to admit or deny  
14 the allegations of Paragraph 23 if the Complaint.

15           28. Defendant is without sufficient information sufficient to admit or deny  
16 the allegations of Paragraph 24 if the Complaint.

17           29. Defendant is without sufficient information sufficient to admit or deny  
18 the allegations of Paragraph 25 if the Complaint.

19           30. Defendant is without sufficient information sufficient to admit or deny  
20 the allegations of Paragraph 26 if the Complaint.

21           31. Defendant is without sufficient information sufficient to admit or deny  
22 the allegations of Paragraph 27 if the Complaint.

23           32. Defendant is without sufficient information sufficient to admit or deny  
24 the allegations of Paragraph 28 if the Complaint.

25           33. Defendant is without sufficient information sufficient to admit or deny  
26 the allegations of Paragraph 29 if the Complaint.

27           34. Defendant is without sufficient information sufficient to admit or deny  
28 the allegations of Paragraph 30 if the Complaint.

1           31. Defendant is without sufficient information sufficient to admit or deny  
2 the allegations of Paragraph 31 if the Complaint.

3           32. Denied.

4           33. Defendant is without sufficient information sufficient to admit or deny  
5 the allegations of Paragraph 33 if the Complaint.

6           34. Defendant is without sufficient information sufficient to admit or deny  
7 the allegations of Paragraph 34 if the Complaint.

8           35. Denied.

9           36. Denied.

10          37. Denied.

11          38. Denied.

12          39. Denied.

13          40. Denied.

14          41. Denied.

15          42. Denied.

16          43. Defendant admits that he received a letter regarding the Destiny 2  
17 Cheats and that he made a statement via Telegram that speaks for itself. Defendant  
18 denies the remaining allegations in paragraph 43 of the Complaint.

19          44. Defendant is without sufficient information sufficient to admit or deny  
20 the allegations that the Destiny 2 Cheats were removed from public-facing pages  
21 of the GatorCheats website and that despite the public removal of the Destiny 2  
22 Cheats from the GatorCheats website, information about the Destiny 2 Cheats  
23 remained accessible on the GatorCheats website for weeks thereafter. Defendant  
24 denies the remaining allegations of Paragraph 44 if the Complaint.

25          45. Denied.

26          46. Denied.

27          47. Defendant is without sufficient information sufficient to admit or deny  
28 the allegations of Paragraph 47 if the Complaint.

1 48. Denied.

2 49. Defendant is without sufficient information sufficient to admit or deny  
3 the allegations that the Cheating Software has no purpose or function other than to  
4 enable players to violate the License Agreements by using cheats and exploits.  
5 Defendant denies the remaining allegations in paragraph 49 of the Complaint

6 50. Denied.

7 a. Denied.

8 b. Denied.

9 c. Denied.

10 51. Denied.

11 **COUNT I**

12 **Trafficking In Circumvention Devices**

13 52. Defendant incorporates its preceding responses as if set forth fully  
14 herein.

15 53. Paragraph 53 of the Complaint states only a legal conclusion to which  
16 no response is required. Defendant is also without sufficient information sufficient  
17 to admit or deny the allegations of Paragraph 53.

18 54. Paragraph 54 of the Complaint states only a legal conclusion to which  
19 no response is required. Defendant is also without sufficient information sufficient  
20 to admit or deny the allegations of Paragraph 54.

21 55. Denied.

22 56. Denied.

23 57. Denied.

24 58. Paragraph 58 of the Complaint states only a legal conclusion to which  
25 no response is required. To the extent any response is required, Defendant denies  
26 said allegations.

27 59. Paragraph 59 of the Complaint states only a legal conclusion to which  
28 no response is required. To the extent any response is required, Defendant denies

1 said allegations.

2 60. Paragraph 60 of the Complaint states only a legal conclusion to which  
3 no response is required. To the extent any response is required, Defendant denies  
4 said allegations.

5 61. Denied.

6 62. Paragraph 62 of the Complaint states only a legal conclusion to which  
7 no response is required. To the extent any response is required, Defendant denies  
8 said allegations.

9 63. Paragraph 63 of the Complaint states only a legal conclusion to which  
10 no response is required. To the extent any response is required, Defendant denies  
11 said allegations.

12 64. Paragraph 64 of the Complaint states only a legal conclusion to which  
13 no response is required. To the extent any response is required, Defendant denies  
14 said allegations.

15 65. Paragraph 65 of the Complaint states only a legal conclusion to which  
16 no response is required. To the extent any response is required, Defendant denies  
17 said allegations.

18 **COUNT II**

19 **Intentional Interference With Contractual Relations**

20 66. Defendant incorporates its preceding responses as if set forth fully  
21 herein.

22 67. Defendant is without sufficient information sufficient to admit or deny  
23 the allegations of Paragraph 67 if the Complaint.

24 68. Paragraph 68 of the Complaint states only a legal conclusion to which  
25 no response is required. To the extent any response is required, Defendant denies  
26 said allegations.

27 69. Paragraph 69 of the Complaint states only a legal conclusion to which  
28 no response is required. Defendant is also without sufficient information sufficient

1 to admit or deny the allegations of Paragraph 69.

2 70. Denied.

3 71. Paragraph 71 of the Complaint states only a legal conclusion to which  
4 no response is required. To the extent any response is required, Defendant denies  
5 said allegations.

6 72. Paragraph 72 of the Complaint states only a legal conclusion to which  
7 no response is required. To the extent any response is required, Defendant denies  
8 said allegations.

9 73. Paragraph 73 of the Complaint states only a legal conclusion to which  
10 no response is required. To the extent any response is required, Defendant denies  
11 said allegations.

12 74. Paragraph 74 of the Complaint states only a legal conclusion to which  
13 no response is required. To the extent any response is required, Defendant denies  
14 said allegations.

15 75. Paragraph 75 of the Complaint states only a legal conclusion to which  
16 no response is required. To the extent any response is required, Defendant denies  
17 said allegations.

18 **COUNT III**

19 **Unfair Competition**

20 76. Defendant incorporates its preceding responses as if set forth fully  
21 herein.

22 77. Paragraph 77 of the Complaint states only a legal conclusion to which  
23 no response is required. To the extent any response is required, Defendant denies  
24 said allegations.

25 78. Paragraph 78 of the Complaint states only a legal conclusion to which  
26 no response is required. To the extent any response is required, Defendant denies  
27 said allegations.

28 79. Paragraph 79 of the Complaint states only a legal conclusion to which

1 no response is required. Defendant is also without sufficient information sufficient  
2 to admit or deny the allegations of Paragraph 79.

3 80. Paragraph 78 of the Complaint states only a legal conclusion to which  
4 no response is required. To the extent any response is required, Defendant denies  
5 said allegations.

6 **AFFIRMATIVE DEFENSES**

7 Without conceding that any of the following are affirmative defenses or  
8 undertaking the burden of production or persuasion as to any fact or issue as to  
9 which Plaintiffs bear such burden, Defendant asserts the following:

10 1. The Complaint fails to set forth a claim upon which relief may be  
11 granted and fails to plead any alleged fraud with the requisite particularity

12 2. Any Contracts alleged in the Complaint to exist are void and  
13 unenforceable.

14 3. Defendant is not subject to personal jurisdiction in this Court.

15 4. This Court is not a proper venue for this action.

16 5. All claims in the Complaint are subject to mandatory, binding, and  
17 confidential arbitration. Plaintiffs are estopped from denying same.

18 6. All claims in the Complaint are barred by license, approval, or  
19 acquiescence.

20 7. All claims in the Complaint are barred by Plaintiff's misuse of its  
21 alleged intellectual property, including by copyright, trademark, and patent misuse.

22 8. All of Plaintiffs' claims are barred by the doctrine of estoppel.

23 9. All of Plaintiffs' claims are barred by the First Amendment. Any  
24 statute or law purporting to impose liability upon Defendant based on the conduct  
25 alleged is invalid and unconstitutional.

26 10. All of Plaintiffs' claims, and in particular the First Claim, are barred  
27 by the doctrine of Fair Use.

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**PRAYER FOR RELIEF**

WHEREFORE, Defendant requests that the Court enter judgment in his favor and against Plaintiffs and award Defendant his costs, attorney’s fees, and other expenses.

**JURY DEMAND**

WHEREFORE, Defendant demands a jury as to all issues so triable.

Dated: March 24, 2021

HOLLAND & HART LLP

By: /s/Benjamin N. Simler

Benjamin N. Simler

*Attorneys for Defendant Cameron Santos*

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