

STATE OF NORTH CAROLINA
COUNTY OF DURHAM

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
25-CV-004246-310

The ARG Group, LLC,

Plaintiff,

vs.

Cyberlux Corporation,

Defendant.

ANSWER

Defendant Cyberlux Corporation (“Defendant”) responds to Plaintiff’s Complaint as follows:

1. Defendant lacks knowledge or information sufficient to form a belief as to the truthfulness of the allegations in Paragraph 1 and, therefore, denies the same.
2. Defendant lacks knowledge or information sufficient to form a belief as to the truthfulness of the allegations in Paragraph 1 and, therefore, denies the same.
3. Admitted.
4. Defendant admits that it develops, manufactures, and sells UAS products including hardware and software solutions. Except as admitted, Paragraph 4 is denied.
5. Defendant admits that its products include certain drone hardware, software operating platforms, and related hardware. Except as admitted, Paragraph 5 is denied.
6. Paragraph 6 calls for a legal conclusion and, therefore, requires no response.

7. Paragraph 7 calls for a legal conclusion and, therefore, requires no response.

8. Defendant realleges and incorporates by reference its responses to the preceding paragraphs as though fully set forth herein.

9. Defendant admits that on or about February 28, 2022, Defendant and Plaintiff entered into a Distributer Partner Agreement, the contents of which speak for themselves. Except as admitted, Paragraph 9 is denied.

10. Defendant admits that the contents of contract speak for themselves. Except as admitted, and to the extent Paragraph 10 is inconsistent with said contractual terms, Paragraph 10 is denied.

11. Denied.

12. Denied.

13. Denied.

14. Denied.

15. Denied.

16. Denied.

17. Denied.

18. Denied.

19. Denied.

20. Denied.

21. Defendant realleges and incorporates by reference its responses to the preceding paragraphs as though fully set forth herein.

22. Denied.

23. Denied.

24. Denied.

25. Denied.

26. Denied.

27. Denied.

28. Denied.

29. Denied.

30. Denied.

31. Defendant realleges and incorporates by reference its responses to the preceding paragraphs as though fully set forth herein.

32. Denied.

33. Denied.

34. Denied.

35. Denied.

36. Denied.

37. Denied.

38. Defendant realleges and incorporates by reference its responses to the preceding paragraphs as though fully set forth herein.

39. Denied.

40. Denied.

41. Denied.

42. Denied.

43. Denied.

44. Denied.

45. Defendant realleges and incorporates by reference its responses to the preceding paragraphs as though fully set forth herein.

46. Denied.

47. Denied.

48. Denied.

49. Denied.

50. Denied.

51. Denied.

52. Denied.

53. Denied.

54. Denied.

55. Denied.

56. Denied.

57. Denied.

FIRST AFFIRMATIVE DEFENSE

Plaintiff's Complaint fails to state a claim upon which relief may be granted, in whole or in part, and therefore should be dismissed pursuant to North Carolina Rule of Civil Procedure 12(b)(6).

WHEREFORE, Defendant respectfully requests that:

1. Plaintiff have and recover nothing from Defendant and that Plaintiff's Complaint be dismissed with prejudice;
2. That the costs of this action be taxed against Plaintiff;
3. That all issues of fact be tried before a jury; and
4. For all such other and further relief as the Court may deem just and proper.

This the 7th day of July, 2022.

ALLEN, CHESSON & GRIMES PLLC

/s/ Doug Grimes

J. Douglas Grimes, NC Bar #32699

505 N. Church Street

Charlotte, North Carolina 28202

Telephone: 704.755.6010

dgrimes@allenchesson.com

Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document has been served by mailing a true copy thereof, through the United States Mail, first class, postage prepaid, on this the 7th day of July, 2025, properly addressed as follows:

Christian Lunghi
ANDERSON JONES, PLLC
Post Office Box 60978
Raleigh, North Carolina 20248
Phone: (919) 277-2541
clunghi@andersonjones.com

Attorneys for Plaintiff

/s/ Doug Grimes
Doug Grimes