

1 MICHAEL E. DERGOSITS (State Bar No. 118206)  
 2 TEDDY K. JOE (State Bar No. 242589)  
 3 DERGOSITS & NOAH, L.L.P.  
 4 Four Embarcadero Center, Suite 1450  
 5 San Francisco, CA 94111  
 6 Telephone: (415) 705-6377  
 7 Facsimile: (415) 750-6383  
 8 Email: mdergosits@dergnoah.com  
 9 Email: tjoe@dergnoah.com

10 Edward W. Goldstein  
 11 Corby R. Vowell  
 12 GOLDSTEIN, FAUCETT & PREBEG, LLP  
 13 1177 West Loop South, Suite 400  
 14 Houston, TX 77027  
 15 Telephone: (713) 877-1515  
 16 Facsimile: (713) 877-1737  
 17 Email: egoldstein@gfpiplaw.com  
 18 Email: cvowell@gfpiplaw.com

Attorneys for Textscape LLC

19 IN THE UNITED STATES DISTRICT COURT  
 20 FOR THE NORTHERN DISTRICT OF CALIFORNIA

21	TEXTSCAPE LLC,	§	
22		§	
23	Plaintiff,	§	Civil Action No.: 5:09-cv-04552 JF
24	v.	§	
25	GOOGLE INC.,	§	PLAINTIFF TEXTSCAPE LLC'S
26		§	ANSWER TO COUNTERCLAIMS
27		§	OF DEFENDANT GOOGLE INC.
28	Defendant.	§	

29 Plaintiff Textscape LLC (“Textscape”) files this Answer to the Counterclaims of  
 30 Defendant Google Inc. (“Google”), and responds as follows:

31 1. Textscape admits the allegations contained in paragraph 1 of Google’s  
 32 Counterclaims.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

2. Textscape admits the allegations contained in paragraph 2 of Google's Counterclaims.

3. Textscape admits the allegations contained in paragraph 3 of Google's Counterclaims.

4. Textscape admits the allegations contained in paragraph 4 of Google's Counterclaims.

5. Textscape admits the allegations contained in paragraph 5 of Google's Counterclaims.

6. Textscape denies the allegations contained in paragraph 6 of Google's Counterclaims.

7. Textscape denies the allegations contained in paragraph 7 of Google's Counterclaims.

8. Textscape admits that in paragraph 8 of Google's Counterclaims, Google purports to re-allege and incorporate by reference the allegations that set forth in paragraphs 1-7. Textscape denies any remaining allegations in paragraph 8 of Google's Counterclaims.

9. Textscape admits the allegations contained in paragraph 9 of Google's Counterclaims.

10. Textscape denies the allegations contained in paragraph 10 of Google's Counterclaims.

11. Textscape denies the allegations contained in paragraph 11 of Google's Counterclaims.

12. Textscape denies the allegations contained in paragraph 12 of Google's Counterclaims.

13. Textscape admits that in paragraph 13 of Google's Counterclaims, Google purports to re-allege and incorporate by reference the allegations that set forth in

1 paragraphs 1-12. Textscape denies any remaining allegations in paragraph 13 of  
2 Google's Counterclaims.

3 14. Textscape admits the allegations contained in paragraph 14 of Google's  
4 Counterclaims.

5 15. Textscape denies the allegations contained in paragraph 15 of Google's  
6 Counterclaims.

7 16. Textscape denies the allegations contained in paragraph 16 of Google's  
8 Counterclaims.

9 17. Textscape denies the allegations contained in paragraph 17 of Google's  
10 Counterclaims.

11  
12 **PRAYER FOR RELIEF**

13 WHEREFORE, Plaintiff prays for judgment as set forth and requested in the  
14 Complaint; and in addition as follows:

- 15 1. that judgment be rendered herein against Google;  
16 2. that Google be denied any such other and further relief as requested; and  
17 3. for any and other such further relief to which Plaintiff may be entitled or  
18 which the court deems just and proper.

19  
20  
21 Dated: February 12, 2010

Respectfully submitted,

22 /s/ Edward W. Goldstein  
23 Edward W. Goldstein  
24 Corby R. Vowell  
25 GOLDSTEIN, FAUCETT & PREBEG,  
26 L.L.P.  
27 1177 West Loop South, Suite 400  
28 Houston, Texas 77027  
Telephone: (713) 877-1515  
Facimile: (713) 877-1145  
E-mail: egoldstein@gfpiplaw.com

cvowell@gfpiplaw.com

ATTORNEYS FOR PLAINTIFF  
TEXTSCAPE LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on February 12, 2010. Any other counsel of record will be served by first class U.S. mail.

/s/ Edward W. Goldstein  
Edward W. Goldstein