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9 Attorneys for Plaintiff
 10 EIT Holdings LLC

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 12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN JOSE DIVISION

15 EIT HOLDINGS LLC, a Delaware company,
 16
 Plaintiffs,
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 vs.
 18 LINKEDIN CORPORATION, a Delaware
 Corporation,
 19
 Defendants.
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Case No. 5:11-CV-2465-PSG

**PLAINTIFF EIT HOLDINGS LLC'S
 REPLY TO LINKEDIN
 CORPORATION'S COUNTERCLAIMS**

21 Plaintiff, EIT Holdings LLC ("EIT Holdings"), files this Answer to LinkedIn
 22 Corporation's ("LinkedIn") Counterclaims and responds as follows:
 23

JURISDICTION AND VENUE

- 24 1. Admitted.
- 25 2. Admitted.
- 26 3. Admitted.
- 27 4. Admitted.
- 28

1 **FIRST COUNTERCLAIM FOR RELIEF**

2 **(Declaratory Judgment of Non-Infringement of '837 patent)**

- 3 5. Admitted.
4 6. Admitted.
5 7. Denied.
6 8. Denied.
7

8 **SECOND COUNTERCLAIM FOR RELIEF**

9 **(Declaratory Judgment of Invalidity of the '837 patent)**

- 10 9. Admitted.
11 10. Admitted.
12 11. Denied.
13

14 **REQUEST FOR RELIEF**

- 15 12. Plaintiff denies that Defendant is entitled to the following relief:
16 (a) A judgment that EIT recover nothing by its Complaint;
17 (b) A judgment that EIT's Complaint be dismissed with prejudice and that each
18 request for relief therein be denied.
19 (c) A declaratory judgment that Defendant has not willfully, recklessly or
20 otherwise infringed the '837 patent and is not infringing the '837 patent;
21 (d) A declaratory judgment that Defendant has not willfully, recklessly or
22 otherwise contributed to or induced others to infringe the '837 patent, and is
23 not contributing to or inducing others to infringe the '837 patent;
24 (e) A declaratory judgment that the '837 patent, and all claims thereof, are
25 invalid;
26 (f) A judgment declaring this case exceptional under 35 U.S.C. Section 285, and
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for an award of attorney's fees, costs and expenses; and
(g) Such other and further relief as the Court deems proper.

Dated: July 11, 2011

Respectfully submitted,

By: /s/ Edward W. Goldstein
Edward W. Goldstein (Pro Hac Vice)
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ATTORNEYS FOR PLAINTIFF

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CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2011, I electronically filed the foregoing document with the Clerk of the Court using this court’s CM/ECF system, which will automatically send e-mail notification of such filing to all counsel who have entered in an appearance in this action. Pursuant to General Order 45(IX)(A), the e-mail notification constitutes service to those counsel of record.

/s/ Edward W. Goldstein
Edward W. Goldstein