

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

XEROX CORPORATION,)	
)	
Plaintiff-Counterclaim Defendant,)	
)	
v.)	C.A. No. 10-136-JJF-MPT
)	
GOOGLE INC., YAHOO! INC., RIGHT)	DEMAND FOR JURY TRIAL
MEDIA INC., RIGHT MEDIA LLC,)	
YOUTUBE, INC., and YOUTUBE, LLC,)	
)	
Defendants-Counterclaim Plaintiffs.)	

**XEROX CORPORATION’S ANSWER TO RIGHT MEDIA DEFENDANTS’
COUNTERCLAIMS FOR DECLARATORY JUDGMENT**

Xerox Corporation (“Xerox”) respectfully submits this Answer in response to the Declaratory Judgment Counterclaims of Right Media LLC (“Right Media”).

Parties

- 1. Xerox admits the allegations of paragraph 1.
- 2. Xerox admits the allegations of paragraph 2.

Jurisdiction and Venue

3. Xerox denies the allegations of paragraph 3, except states that Right Media purports to bring an action under the patent laws of the United States, Title 35 of the United States Code, and the Declaratory Judgment provisions of §§ 2201 and 2202 of Title 28 of the United States Code. Xerox admits that the Court has subject matter jurisdiction under 28 U.S.C. §§ 1331, 1338(a) and the Declaratory Judgment Act.

- 4. Xerox admits the allegations of paragraph 4.

**COUNT I: Declaratory Judgment of Non-Infringement of
U.S. Patent No. 6,778,979 (the ’979 Patent)**

- 5. Xerox repeats its responses to paragraphs 1-4.

6. Xerox denies the allegations of paragraph 6.

**COUNT II: Declaratory Judgment of Invalidity of
U.S. Patent No. 6,778,979 (the '979 Patent)**

7. Xerox repeats its responses to paragraphs 1-6.

8. Xerox denies the allegations of paragraph 8.

RIGHT MEDIA'S PRAYER FOR RELIEF

Xerox denies that Right Media is entitled to any relief.

ASHBY & GEDDES, P.A.

/s/ Lauren E. Maguire

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