UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

MINERVA INDUSTRIES, INC.,

Plaintiff,

v.

The Honorable T. John Ward United States District Judge

Civil Action No: 2-07 CV-229

MOTOROLA, INC., et al.

Defendants.

MINERVA INDUSTRIES, INC.'S REPLY TO SONY ERICSSON'S COUNTERCLAIMS

Plaintiff Minerva Industries, Inc. files this Reply to Sony Ericsson Mobile Communications (USA) Inc.'s Counterclaims and alleges as follows:

1. Plaintiff Minerva Industries, Inc. ("Minerva") admits the allegations in paragraph

1 of Sony Ericsson Mobile Communications (USA) Inc.'s ("Sony Ericsson") Counterclaims ("Counterclaims").

2. Minerva admits the allegations in paragraph 2 of the Counterclaims.

3. Minerva admits the allegations in paragraph 3 of the Counterclaims.

FIRST COUNTERCLAIM

4. Minerva repeats and incorporates by reference the allegations contained in paragraphs 1 through 3 above as if fully set forth herein.

- 5. Minerva admits the allegations in paragraph 5 of the Counterclaims.
- 6. Minerva admits the allegations in paragraph 6 of the Counterclaims.
- 7. Minerva denies the allegations in paragraph 7 of the Counterclaims.
- 8. Minerva denies the allegations in paragraph 8 of the Counterclaims.

SECOND COUNTERCLAIM

9. Minerva repeats and incorporates by reference the allegations contained in paragraphs 1 through 8 above as if fully set forth herein.

- 10. Minerva admits the allegations in paragraph 10 of the Counterclaims.
- 11. Minerva denies the allegations in paragraph 11 of the Counterclaims.
- 12. Minerva denies the allegations in paragraph 12 of the Counterclaims.

PRAYER FOR RELIEF

13. Minerva denies that Sony Ericsson is entitled to any relief requested in the Prayer for Relief in its Counterclaims, or any other relief whatsoever.

Dated: December 10, 2007

Respectfully submitted,

By: <u>/s/ Collin Maloney</u>

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record are being served with a copy

of this document via electronic delivery or United States mail this 10th day of December, 2007.

/s/ Collin Maloney