

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

POLARIS IP, LLC,

Plaintiff,

v.

GOOGLE INC., et al.;

Defendants.

Civil Action No. 2:07-cv-371-TJW-CE

JURY TRIAL DEMANDED

**PLAINTIFF'S REPLY TO COUNTERCLAIMS OF IAC/INTERACTIVECORP
AND IAC SEARCH AND MEDIA, INC.**

Plaintiff Polaris IP, LLC ("Polaris") replies to the counterclaims of Defendants IAC/InterActiveCorp and IAC Search and Media, Inc. (collectively "IAC") by corresponding paragraph number as follows:

1. Paragraph 1 of IAC's counterclaims purports to incorporate "by reference what is set out in the proceeding paragraphs as if fully set forth herein." This is improper and incapable of being admitted or denied. Subject to the foregoing, Polaris re-alleges the matters alleged in its Complaint and denies the merits of IAC's denials, defenses, affirmative defenses and counterclaims. Also subject to the foregoing, Polaris lacks knowledge or information sufficient to form a belief regarding the other matters asserted in this paragraph, and therefore denies them upon information and belief.
2. Admitted. Denied as to merits of counterclaims.
3. Denied.
4. Admitted as to jurisdiction over counterclaims. Denied as to merits of counterclaims.

Count I

5. Polaris re-alleges and incorporates by reference its replies to Paragraphs 1-4 above.
6. Denied.
7. Denied.

Count II

8. Polaris re-alleges and incorporates by reference its replies to Paragraphs 1-7 above.
9. Denied.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Polaris IP, LLC respectfully requests that this Court enter judgment denying and dismissing IAC's counterclaims, and that the Court enter judgment in favor of Polaris as requested in Polaris's complaint, as amended or supplemented.

Respectfully submitted,

POLARIS IP, LLC

Dated: November 12, 2007

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**ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

I hereby certify that the counsel of record who are deemed to have consented to electronic service are being served today with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

Dated: November 12, 2007

/s/ Jason W. Cook
Jason W. Cook