

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

PA ADVISORS, LLC

Plaintiff,

v.

GOOGLE INC., ET AL.

Defendants.

No. 2:07-cv-480-TJW

JURY TRIAL DEMANDED

**PLAINTIFF'S REPLY TO DEFENDANT
24/7 REAL MEDIA, INC.'S COUNTERCLAIMS**

Plaintiff PA Advisors, LLC ("PA Advisors") replies to the counterclaims of Defendant 24/7 Real Media, Inc. ("24/7 Real Media") by corresponding paragraph number as follows:

47. Admitted.

48. Admitted.

49. Admitted that PA Advisors alleges in its First Amended Complaint that it is the owner by assignment of the '067 patent.

50. Admitted that this Court has subject matter jurisdiction over 24/7 Real Media's counterclaims and that venue is proper. Denied as to the merits of 24/7 Real Media's counterclaims.

51. Admitted that a justiciable actual controversy exists between 24/7 Real Media and PA Advisors with respect to the alleged infringement and validity of the '067 patent. Denied as to the merits of 24/7 Real Media's counterclaims.

52. Paragraph 52 purports to incorporate by reference the allegations in paragraphs 47-51 of 24/7 Real Media's counterclaims and is, therefore, improper and incapable of being

admitted or denied. Subject to the foregoing, PA Advisors incorporates its responses to paragraphs 47-51 above.

53. Denied.

54. Paragraph 54 purports to incorporate by reference the allegations in paragraphs 47-53 of 24/7 Real Media's counterclaims and is, therefore, improper and incapable of being admitted or denied. Subject to the foregoing, PA Advisors incorporates its responses to paragraphs 47-53 above.

55. Denied.

56. Denied that 27/7 Real Media is entitled to its attorneys' fees or any other relief relating to its counterclaims because this is an exceptional case within the meaning of 35 U.S.C. § 285.

To the extent necessary, Plaintiff denies that 24/7 Real Media is entitled to the relief requested in its prayer for relief. In addition, to the extent necessary, Plaintiff denies any allegation in the counterclaims not specifically admitted above, and Plaintiff re-alleges infringement, enforceability, validity and its damages, and denies any allegations in the counterclaims adverse to same. Plaintiff admits that 24/7 Real Media has demanded a trial by jury of any issues triable of right by jury in this action.

PRAYER FOR RELIEF

PA Advisors respectfully requests that this Court enter judgment denying and dismissing 24/7 Real Media's counterclaims, and that the Court enter judgment in favor of Plaintiff as requested in Plaintiff's complaint, as amended or supplemented.

Dated: February 12, 2008

Respectfully submitted,

PA ADVISORS, LLC

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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: February 12, 2008

/s/ Amy E. LaValle