

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
SPECIFIC MEDIA, INC.'S COUNTERCLAIMS**

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

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted that by its counterclaims, Specific Media seeks a declaration of patent non-infringement and patent invalidity pursuant to 35 U.S.C. § 100 *et seq.*, and 28 U.S.C. §§ 2201 and 2202, and admitted that an actual controversy exists between Specific Media and PA Advisors. Denied that Specific Media is entitled to any such relief and denied as to the merits of Specific Media's allegations with respect to its non-infringement and the invalidity of the claims of the '067 patent. Admitted that this Court has subject matter jurisdiction over Specific Media's counterclaims.
6. Admitted.

7. Paragraph 7 purports to incorporate by reference the allegations in paragraphs 1-6 of Specific 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 1-6 above.

8. Admitted.

9. Denied.

10. Admitted that Specific Media seeks a declaration that it does not infringe any valid claim of the '067 patent. Denied that Specific Media is entitled to any such relief and denied as to the merits of Specific Media's allegations with respect to its non-infringement of the claims of the '067 patent.

11. Paragraph 11 purports to incorporate by reference the allegations in paragraphs 1-10 of its counterclaims and is, therefore, improper and incapable of being admitted or denied. Subject to the foregoing, PA Advisors incorporates its responses to paragraphs 1-10 above.

12. Admitted.

13. Denied.

14. Admitted that Specific Media seeks a declaration that one or more claims of the '067 patent are invalid. Denied that Specific Media is entitled to any such relief and denied as to the merits of Specific Media's allegations with respect to the invalidity of the claims of the '067 patent.

To the extent necessary, Plaintiff denies that Specific 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.

PRAYER FOR RELIEF

PA Advisors respectfully requests that this Court enter judgment denying and dismissing Specific 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
PA ADVISORS, LLC**

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