

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 THE COUNTERCLAIMS OF
DEFENDANTS SEEVAST CORPORATION AND PULSE 360, INC.**

Plaintiff PA Advisors, LLC ("PA Advisors") replies to the counterclaims of Defendants Seevast Corporation ("Seevast") and Pulse 360, Inc. ("Pulse 360") by corresponding paragraph number as follows:

40. Admitted that PA Advisors is a Texas limited liability company with its principal place of business at 207 C North Washington Avenue, Marshall, Texas 75670. Otherwise denied.

41. Admitted that there is an actual justiciable controversy between the parties. Denied as to the merits of the counterclaim.

42. Paragraph 42 purports to incorporate by reference the allegations in paragraphs 1 through 41 of Seevast's and Pulse 360's answer, defenses, and counterclaims and is, therefore, improper and incapable of being admitted or denied. Subject to the foregoing, PA Advisors incorporates its responses to paragraphs 40 through 41 above and denies the merits of Seevast's and Pulse 360's allegations and defenses set forth in its answer.

43. Admitted that Plaintiff has accused Seevast and Pulse 360 of infringement of the '067 patent-in-suit. Otherwise denied.

44. Admitted that Seevast and Pulse 360 deny infringement of the '067 patent-in-suit. Denied as to the merits of Seevast's and Pulse 360's denial of infringement. Plaintiff denies the remaining allegations in this paragraph.

45. Denied.

46. Admitted that Seevast and Pulse 360 demand a trial by jury of all claims in the complaint and in their counterclaims.

To the extent necessary, Plaintiff denies that Seevast and Pulse 360 are entitled to the relief requested in their 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 Seevast's and Pulse 360's counterclaims, and that the Court enter judgment in favor of Plaintiff as requested in Plaintiff's complaint, as amended or supplemented.

Dated: February 14, 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 14, 2008

/s/ Amy E. LaValle