

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 GOOGLE INC.'S COUNTERCLAIMS

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

1. Admitted.
2. Denied that PA Advisors, LLC is a "corporation." Otherwise admitted.
3. Admitted.
4. Admitted.
5. Paragraph 5 purports to incorporate by reference the allegations in paragraphs 1 through 36 of Google's answer and defenses and paragraphs 1 through 4 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 through 4 above and denies the merits of Google's allegations and defenses set forth in its answer.
6. Admitted.
7. Admitted.
8. Denied.

9. Paragraph 9 purports to incorporate by reference the allegations in paragraphs 1 through 36 of Google's answer and defenses and paragraphs 1 through 8 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 through 8 above and denies the merits of Google's allegations and defenses set forth in its answer.

10. Denied.

11. Denied.

To the extent necessary, Plaintiff denies that Google 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 Google's counterclaims, and that the Court enter judgment in favor of Plaintiff as requested in Plaintiff's complaint, as amended or supplemented.

Dated: February 21, 2008

Respectfully submitted,

PA ADVISORS, LLC

By: /s/ Amy E. LaValle

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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 21, 2008

/s/ Amy E. LaValle