

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

PA ADVISORS, LLC

Plaintiff,

v.

GOOGLE INC., et al,

Defendants.

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CIVIL ACTION NO. 2:07-CV-480 (D)

**JURY TRIAL DEMANDED**

**REPLY TO COUNTERCLAIMS OF DEFENDANT GOOGLE INC.**

Plaintiff PA ADVISORS, LLC (“Plaintiff”) responds to the Counterclaims of Defendant GOOGLE INC. (“Defendant”) filed September 10, 2008, as follows:

**COUNTERCLAIMS**

- 1. The allegations in paragraph 1 are admitted upon information and belief.
- 2. The allegations in paragraph 2 are admitted.

**JURISDICTION AND VENUE**

- 3. The allegations in paragraph 3 are admitted.
- 4. The allegations in paragraph 4 are admitted.

**COUNT 1: Declaratory Judgment of Non-Infringement**

- 5. Plaintiff incorporates paragraphs 1-4 above.
- 6. The allegations in paragraph 6 are admitted.
- 7. The allegations in paragraph 7 are admitted.
- 8. The allegations in paragraph 8 are denied.

**COUNT II: Declaratory Judgment of Invalidity and/or Unenforceability**

9. Plaintiff incorporates paragraphs 1-8 above.

10. The allegations in paragraph 10 are denied.

**EXCEPTIONAL CASE**

11. The allegations in paragraph 11 are denied.

**REQUEST FOR RELIEF**

Although no answer is required to Defendant's prayer for relief, Plaintiff denies all allegations in subparagraphs 1 through 6 and further denies that any relief should be granted to Defendant whatsoever.

**DEMAND FOR JURY TRIAL**

Plaintiff demands a trial by jury on all matters raised by Defendant's counterclaims and by Plaintiff in its Original Complaint (and any supplements or amendments thereto), for which trial by jury is appropriate.

Dated: September 24, 2008

Respectfully submitted,

/s/ Michael T. Cooke  
Jonathan T. Suder  
FRIEDMAN SUDER & COOKE  
Tindall Square Warehouse No. 1  
604 East 4<sup>th</sup> Street, Suite 200  
Fort Worth, TX 76102  
Ph. 817-334-0400  
Fax: 817-224-0401  
E-mail: [jts@fsclaw.com](mailto:jts@fsclaw.com)  
E-mail: [mtc@fsclaw.com](mailto:mtc@fsclaw.com)

Andrew Wesley Spangler  
SPANGLER LAW P.C.  
208 N. Green St, Suite 300  
Longview, TX 75601  
Ph. 903-753-9300  
Fax: 903-553-0403  
E-mail: [spangler@spanglerlawpc.com](mailto:spangler@spanglerlawpc.com)

David Michael Pridham  
LAW OFFICE OF DAVID PRIDHAM  
25 Linden Road  
Barrington, RI 02806  
Ph. 401-633-7247  
Fax: 401-633-7247  
E-mail: [david@pridhamiplaw.com](mailto:david@pridhamiplaw.com)

Joseph Diamante  
JENNER & BLOCK LLP  
919 Third Avenue, 37th Floor  
New York, New York 10022-3908  
Telephone: (212) 891-1600  
Facsimile: (212) 891-1699  
E-mail: [jdiamante@jenner.com](mailto:jdiamante@jenner.com)

Patrick Rolf Anderson  
PATRICK R. ANDERSON PLLC  
4225 Miller Rd., Bldg. B-9, Suite 358  
Flint, MI 48507  
Ph. 517-303-4806  
Fax 248-928-9239  
E-mail: [patrick@prapllc.com](mailto:patrick@prapllc.com)

ATTORNEYS FOR PLAINTIFF  
PA ADVISORS, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of September, 2008, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Michael T. Cooke

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