

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 YAHOO! INC.

Plaintiff PA ADVISORS, LLC (“Plaintiff”) responds to the Counterclaims of Defendant YAHOO! INC. (“Defendant”) filed September 12, 2008, as follows:

YAHOO’S COUNTERCLAIMS AGAINST PAA

1. The allegations in paragraph 1 are admitted upon information and belief.
2. The allegations in paragraph 2 are admitted.
3. The allegations in paragraph 3 are admitted.
4. The allegations in paragraph 4 are admitted.
5. The allegations in paragraph 5 are admitted.
6. The allegations in paragraph 6 are admitted.

**COUNTERCLAIM NO. 1
DECLARATION OF NON-INFRINGEMENT OF U.S. PATENT NO. 6,199,067**

7. Plaintiff incorporates paragraphs 1-6 above.
8. Plaintiff admits that Defendant purports to bring a counterclaim in the form of an action for declaratory judgment of non-infringement, but denies that Defendant’s counterclaims have any factual or legal basis.

COUNTERCLAIM NO. 2
DECLARATION OF INVALIDITY OF U.S. PATENT NO. 6,199,067

9. Plaintiff incorporates paragraphs 1-8 above.

10. Plaintiff admits that Defendant purports to bring a counterclaim in the form of an action for declaratory judgment of invalidity, but denies that Defendant's counterclaims have any factual or legal basis.

COUNTERCLAIM NO. 3
DECLARATION OF UNENFORCEABILITY OF U.S. PATENT NO. 6,199,067

11. Plaintiff incorporates paragraphs 1-10 above.

12. The allegations in paragraph 12 are admitted.

13. The allegations in paragraph 13 are admitted.

14. The allegations in paragraph 14 are admitted.

15. Plaintiff is without sufficient information to admit or deny the allegations in paragraph 15.

16. Plaintiff admits that the International Search Report is dated April 12, 2000. Except as otherwise admitted, the allegations in paragraph 16 are denied.

17. Plaintiff admits that the International Search Report was filed by an examiner in connection with PCT patent application PCT/US00/01373. Except as otherwise admitted, the allegations in paragraph 17 are denied.

18. The allegations in paragraph 18 are denied.

19. The allegations in paragraph 19 are denied.

REQUEST FOR RELIEF

Although no answer is required to Defendant's prayer for relief, Plaintiff denies all allegations in subparagraphs (a) through (h) 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 4th Street, Suite 200
Fort Worth, TX 76102
Ph. 817-334-0400
Fax: 817-224-0401
E-mail: jts@fsclaw.com
E-mail: 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

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

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

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@praplpc.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