

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: January 14, 2008

Respectfully submitted,

PA ADVISORS, LLC

By: /s/ David M. Pridham

Eric M. Albritton

Texas State Bar No. 00790215

ALBRITTON LAW FIRM

P.O. Box 2659

Longview, Texas 75606

Telephone: (903) 757-8449

Facsimile: (903) 758-7397

E-mail: ema@emafirm.com

David M. Pridham

R.I. State Bar No. 6625

IP NAVIGATION GROUP, LLC

207 C North Washington Avenue

Marshall, Texas 75670

Telephone: (903) 234-0507

Facsimile: (903) 234-2519

E-mail: david@ipnav.com

Amy E. LaValle

Texas State Bar No. 24040529

THE LAVALLE LAW FIRM

3811 Turtle Creek Boulevard

Suite 1620

Dallas, Texas 75219

Telephone: (214) 732-7533

Facsimile: (214) 292-8831

E-mail: lavalle@lavallelawfirm.com

Of Counsel:
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

**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: January 14, 2008

/s/ Amy E. LaValle