

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

SOFTWARE RIGHTS ARCHIVE, LLC

Plaintiff,

v.

**GOOGLE INC., YAHOO! INC.,
IAC SEARCH & MEDIA, INC., AOL LLC,
and LYCOS, INC.**

Defendants.

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Civil Action No. 2:07-cv-511-TJW

JURY TRIAL DEMANDED

**PLAINTIFF’S RESPONSE TO DEFENDANT
GOOGLE, INC’S ORIGINAL ANSWER AND COUNTERCLAIMS**

Plaintiff Software Rights Archive, LLC (“Plaintiff”) responds to Defendant GOOGLE INC’S (“Defendant”) counterclaims:

General Denial

Pursuant to Fed. R. Civ. P. 8(b), Plaintiff denies all averments related to the counterclaims of Defendant, except as specifically admitted below.

Specific Denials to Counterclaims

Paragraphs 33-43 below correspond to the paragraphs of Defendant’s counterclaims.

33. Plaintiff admits that GOOGLE has filed a request for a declaratory judgment, but denies that a counterclaim is the valid procedure for resolving this controversy, or the validity of GOOGLE INC’S assertions.

34. Admitted.

35. Admitted.

36. Admitted, but denies that a counterclaim is the valid procedure for resolving this controversy.

37. Admitted.

38. Admitted.

39. Admitted.

40. Admitted.

41. Admitted.

42. Denied.

43. Denied.

Plaintiff further denies all of the allegations contained in the Request for Relief.

The jury demand does not require an admission or denial.

Conclusion

For these reasons, Plaintiff respectfully requests that the Court:

- (a) grant such relief as requested in Plaintiff's Original Complaint,
- (b) order that Defendant takes nothing on its defenses or counterclaims; and
- (c) order such other and further legal and equitable relief.

DATED: February 20th, 2008

Respectfully Submitted,



Lee L. Kaplan

LEAD ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been forwarded to all counsel of record pursuant to Federal Rules of Civil Procedure on this the 20th day of **February, 2008**.



Lee Kaplan