

**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. §

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

JURY TRIAL DEMANDED

**PLAINTIFF’S RESPONSE TO DEFENDANT
YAHOO! INC’S ORIGINAL ANSWER AND COUNTERCLAIMS**

Plaintiff Software Rights Archive, LLC (“Plaintiff”) responds to Defendant YAHOO!
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 42-64 below correspond to the paragraphs of Defendant’s counterclaims.

42. Plaintiff again incorporates its allegations and denies Defendant’s response.

43. Admitted.

44. Admitted.

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

46. Admitted.

47. Admitted.
48. Admitted.
49. Denied.
50. Plaintiff again incorporates its allegations and denies Defendant's response.
51. Denied.
52. Denied.
53. Denied.
54. Denied.
55. Plaintiff again incorporates its allegations and denies Defendant's response.
56. Denied.
57. Denied.
58. Denied.
59. Denied.
60. Plaintiff again incorporates its allegations and denies Defendant's response.
61. Denied.
62. Denied.
63. Denied.
64. 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,



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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