

**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  
IAC SEARCH & MEDIA, INC.’S ORIGINAL ANSWER AND COUNTERCLAIMS**

Plaintiff Software Rights Archive, LLC (“Plaintiff”) responds to Defendant IAC Search & Media, 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 1-18 below correspond to the paragraphs of Defendant’s counterclaims.

1. Admitted.
2. Admitted.
3. Admitted, but denies that a counterclaim is a valid procedure for resolving this controversy.
4. Admitted.

5. Plaintiff denies that the '352 patent was issued improperly, but admits to being the exclusive licensee with all substantial rights to the '352 patent.
6. Plaintiff admits that the parties have made these allegations.
7. Admitted, but denies that a counterclaim is the valid procedure for resolving this controversy.
8. Plaintiff denies that the '494 patent was issued improperly, but admits to being the exclusive licensee with all substantial rights to the '494 patent.
9. Plaintiff admits that the parties have made these allegations.
10. Admitted, but denies that a counterclaim is the valid procedure for resolving this controversy.
11. Plaintiff denies that the '571 patent was issued improperly, but admits to being the exclusive licensee with all substantial rights to the '571 patent.
12. Plaintiff admits that the parties have made these allegations.
13. Admitted, but denies that a counterclaim is the valid procedure for resolving this controversy.
14. Plaintiff again incorporates its allegations and denies Defendant's responses.
15. Denied.
16. Plaintiff again incorporates its allegations and denies Defendant's responses.
17. Denied.
18. 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 20<sup>th</sup>, 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 20<sup>th</sup> day of February, 2008.

  
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Lee Kaplan