

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

GOOSEBERRY NATURAL RESOURCES, LLC

Plaintiff,

Vs.

CONDESA, INC.,  
MASS MEDIA DISTRIBUTION, LLC,  
MEK ENTERPRISES d/b/a ERELEASES.COM,  
PROVEN WAYS, INC.,  
PR WORLDWIDE, INC., and  
RV MEDIA, LLC d/b/a PR 18 NETWORK,

Defendants.

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Civil Action No. 2:10-cv-210-TJW

**JURY TRIAL DEMANDED**

**PLAINTIFF GOOSEBERRY NATURAL RESOURCES, LLC'S ANSWER TO  
DEFENDANT MASS MEDIA DISTRIBUTION, LLC'S COUNTERCLAIM**

Plaintiff Gooseberry Natural Resources, LLC (“Plaintiff”), by and through its undersigned counsel, hereby responds to each paragraph of Defendant Mass Media Distribution, LLC’s (“Mass Media”) Counterclaim as follows:

**COUNTERCLAIM**

- 1. Admitted that Mass Media Distribution, LLC purports to incorporate all of the allegations of the Answer into the Counterclaim.
- 2. Admitted that Mass Media Distribution, LLC purports to bring claims against Plaintiff Gooseberry Natural Resources, LLC under the Federal Declaratory Judgment Act and United States patent laws, but otherwise denied.
- 3. Admitted.
- 4. Admitted.

5. Denied.

6. Denied.

7. Denied.

**MASS MEDIA DISTRIBUTION, LLC'S PRAYER FOR RELIEF**

Plaintiff Gooseberry Natural Resources, LLC denies that Mass Media Distribution, LLC is entitled to any requested relief sought.

a. Denied.

b. Denied.

c. Denied.

d. Denied.

e. Denied.

f. Denied.

**PLAINTIFF GOOSEBERRY NATURAL RESOURCES, LLC'S  
PRAYER FOR RELIEF**

In addition to the relief requested in Plaintiff Gooseberry Natural Resources, LLC's Complaint, Plaintiff respectfully requests a judgment against Mass Media Distribution, LLC as follows:

A. That Mass Media Distribution, LLC take nothing by its Counterclaim;

B. That the Court award Plaintiff Gooseberry Natural Resources, LLC costs and attorneys' fees incurred in defending against this Counterclaim; and

C. Any and all further relief for Plaintiff Gooseberry Natural Resources, LLC as the Court may deem just and proper.

**JURY DEMAND**

Admitted that Mass Media Distribution, LLC demands a jury trial.

Dated: October 12, 2010

Respectfully submitted,

/s/Melissa Richards Smith  
Melissa Richards Smith  
Texas State Bar No. 24001351  
**GILLAM & SMITH, L.L.P.**  
303 South Washington Avenue  
Marshall, Texas 75670  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257  
E-mail: [melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)

**ATTORNEY FOR PLAINTIFF  
GOOSEBERRY NATURAL RESOURCES,  
LLC**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by U.S. mail or facsimile transmission, on this the 12th day of October, 2010.

/s/Melissa Richards Smith  
Melissa Richards Smith