IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

KLAUSNER TECHNOLOGIES, INC.,	§	
a New York corporation,	§	
a new ronk corporation,	\ \{\}	Case No. 6:08-cv-341 (LED)
Dlaintiff		Case INO. 0.00-CV-341 (LED)
Plaintiff,	§	(HIDA/TDIAI)
	§	(JURY TRIAL)
VS.	§	
	§	
Verizon Wireless (Cellco Partnership d/b/a	§	
Verizon Wireless), a Delaware general	§	
partnership; Verizon Data Services LLC, a	§	
Delaware limited liability company; Bell Atlantic	§	
Communications, Inc., a Delaware corporation;	§	
Citrix Systems, Inc., a Delaware corporation;	§	
Comverse, Inc., a Delaware corporation; Cox	§	
Communications, Inc., a Delaware corporation;	§	
Embarq Communications, Inc., a Delaware	§	
corporation; Google Inc., a Delaware corporation;	§	
GrandCentral Communications, Inc., a Delaware	§	
corporation; LG Electronics Mobilecomm U.S.A.,	§	
Inc., a California Corporation; PhoneFusion, Inc.,	§	
a Delaware corporation; RingCentral, Inc., a	§	
California Corporation,	§	
	§	
Defendants.	§	

PLAINTIFF KLAUSNER TECHNOLOGIES, INC.'S REPLY TO COUNTERCLAIMS OF GRANDCENTRAL COMMUNICATIONS, INC.

Plaintiff Klausner Technologies, Inc. ("Klausner") hereby answers the counterclaims of Defendant GrandCentral Communications, Inc. ("GrandCentral"). The paragraphs in this reply are numbered to correspond with the paragraph numbers in GrandCentral's counterclaims; accordingly, the first numbered paragraph is number 36. All of the allegations of the counterclaims not specifically admitted herein are specifically denied.

The Parties

- 36. Upon information and belief, Klausner admits the allegations contained in paragraph 36 of GrandCentral's counterclaims.
- 37. Klausner admits the allegations contained in paragraph 37 of GrandCentral's counterclaims.
- 38. Klausner admits the allegations contained in paragraph 38 of GrandCentral's counterclaims.
- 39. Klausner admits the allegations contained in paragraph 39 of GrandCentral's counterclaims.

Jurisdiction

- 40. Klausner admits that this Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338.
- 41. Klausner admits the allegations contained in paragraph 41 of GrandCentral's counterclaims.

Venue

42. Klausner admits that venue over these counterclaims is proper in this District Court.

Count 1: Declaratory Relief Regarding the '576 Patent

- 43. Klausner admits the allegations contained in paragraph 43 of GrandCentral's counterclaims.
- 44. Klausner denies the allegations contained in paragraph 44 of GrandCentral's counterclaims.
- 45. Klausner denies the allegations contained in paragraph 45 of GrandCentral's counterclaims.

Count 2: Declaratory Relief Regarding the '818 Patent

46. Klausner admits the allegations contained in paragraph 46 of GrandCentral's counterclaims.

- 47. Klausner denies the allegations contained in paragraph 47 of GrandCentral's counterclaims.
- 48. Klausner denies the allegations contained in paragraph 48 of GrandCentral's counterclaims.

Prayer for Judgment

Klausner denies that GrandCentral is entitled to the judgment it seeks or any relief for the allegations made in its counterclaims.

Jury Demand

Klausner demands trial by jury of all issues.

Dated: December 10, 2008 Respectfully submitted,

By: /s/ Elizabeth L. DeRieux

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ATTORNEYS FOR PLAINTIFF, KLAUSNER TECHNOLOGIES, INC.

CERTIFICATE OF SERVICE

This is to certify that all counsel of record who are deemed to have consented to electronic service are being served this 10th day of December, 2008, 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 via electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ Elizabeth L. DeRieux
Elizabeth L. DeRieux