

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

UNILOC USA, INC. and

UNILOC SINGAPORE PRIVATE LIMITED,

Plaintiffs,

v.

Civ. Action No.: 6:10-cv-00472-LED

(1) NATIONAL INSTRUMENTS CORP.;

(2) PERVASIVE SOFTWARE, INC.;

(3) ADOBE SYSTEMS INC.;

(4) FILEMAKER, INC.;

(5) SAFENET, INC.;

(6) CA, INC.;

(7) PINNACLE SYSTEMS, INC.;

(8) SONIC SOLUTIONS;

(9) ONYX GRAPHICS, INC.;

(10) SYMANTEC CORP.;

**(11) ALADDIN KNOWLEDGE SYSTEMS,
INC. and**

**(12) ALADDIN KNOWLEDGE SYSTEMS
LTD.**

JURY TRIAL DEMANDED

Defendants.

**PLAINTIFFS' REPLY TO COUNTERCLAIMS OF
DEFENDANT SONIC SOLUTIONS**

Plaintiffs, Uniloc USA, Inc. and Uniloc Singapore Private Limited (together “Uniloc” or “Plaintiffs”), reply to the counterclaims of defendant, Sonic Solutions (“Sonic”), as follows:

COUNTERCLAIMS

NATURE AND BASIS OF ACTION

1. Admitted.

PARTIES

2. Admitted.
3. Admitted.
4. Admitted.

JURISDICTION AND VENUE

5. Admitted.
6. Uniloc admits the allegations of the first sentence of paragraph 6, but denies the remaining allegations of paragraph 6.

GENERAL ALLEGATIONS

7. Admitted.
8. Admitted.
9. Uniloc admits that a justiciable controversy exists between Uniloc and Sonic concerning the infringement and validity of the '216 patent. Uniloc denies the remaining allegations of paragraph 9.
10. Denied.

FIRST COUNTERCLAIM

(Declaration of Noninfringement)

11. Uniloc incorporates its responses to paragraphs 1-10 above as if fully set forth herein.
12. Denied.
13. Denied.

SECOND COUNTERCLAIM

(Invalidity of Patent-in-Suit)

14. Uniloc incorporates its responses to paragraphs 1-13 above as if fully set forth herein.

15. Denied.

16. Denied.

AFFIRMATIVE DEFENSES

17. Sonic is barred from relief by the doctrines of waiver, estoppels, laches, unclean hands and/or other equitable defenses.

18. Sonic's counterclaims fail to state a claim upon which relief can be granted.

19. Uniloc reserves the right to assert other affirmative defenses as it may discover or appreciate during this proceeding.

PRAYER FOR RELIEF

WHEREFORE, Uniloc requests that the Court:

- A. Enter judgment in favor of Uniloc on all counts of the counterclaims;
- B. Dismiss Sonic's counterclaims with prejudice;
- C. Deny all relief requested in Sonic's counterclaims and prayer for relief;
- D. Declare this case exceptional and award Uniloc its attorneys' fees, expenses and costs incurred in defending against Sonic's counterclaims; and
- E. Award Uniloc such other and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a jury trial of all issues triable of right by jury.

Respectfully submitted,

**UNILOC USA, INC. and
UNILOC SINGAPORE PRIVATE LTD.**

Date: December 9, 2010

By: /s/ Dean Bostock
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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on December 9, 2010. As of this date, all counsel of record have consented to electronic service and are being served with a copy of this documents through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Dean G. Bostock