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Attorneys for Plaintiff JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND DEVELOPMENT TRUST

UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND DEVELOPMENT TRUST, Plaintiff v. EMERSON ELECTRIC CO., a Missouri corporation; ONE WORLD TECHNOLOGIES, INC., a Delaware corporation; RIDGE TOOL COMPANY, an Ohio corporation; RIDGID, INC., a Delaware corporation; and DOES 1 – 100 Defendants.	Case No. 08cv00060 BTM CAB **REPLY TO COUNTERCLAIM OF ONE WORLD TECHNOLOGIES, INC.**

and related counterclaims.

Plaintiff/Counterdefendant Jens Erik Sorensen as Trustee of Sorensen Research and Development Trust ("SRDT"), hereby responds to the specific paragraphs of the Counterclaims of Defendant/Counterclaimant One World Technologies, Inc.:

1. Admit.

2. Admit.

3. Admit.

4. Admit.

5. Admit.

6. Admit.

7. Admit.

FIRST COUNTERCLAIM
FOR DECLARATION OF NONINFRINGEMENT

8. SRDT realleges and incorporates by reference its responses to paragraphs 1-7, above, as though fully set forth herein.

9. Admit that Counterclaimant is attempting to allege an action under the Federal Declaratory Judgments Act, 28 U.S.C. §§ 2201 and 2202.

10. Deny.

SECOND COUNTERCLAIM
FOR DECLARATION OF PATENT INVALIDITY

11. SRDT realleges and incorporates by reference its responses to paragraphs 1-10, above, as though fully set forth herein.

12. Admit.

13. Deny.

14. Admit that Counterclaimant is attempting to allege an action under the Federal Declaratory Judgments Act, 28 U.S.C. §§ 2201 and 2202.

15. Deny.

WHEREFORE, SRDT prays that judgment on One World Technologies, Inc. Cross-Complaint be entered as follows:

a. For judgment in favor of SRDT and against One World Technologies, Inc. on all requested relief;

b. That this case is decreed an "exceptional case" and SRDT is awarded reasonable attorneys' fees by the Court pursuant to 35 U.S.C. § 285;

c. For costs of suit herein incurred;

d. For such other and further relief as the Court may deem just and proper.

DATED this 12th day of March, 2008.

JENS ERIK SORENSEN, as Trustee of
SORENSEN RESEARCH AND DEVELOPMENT
TRUST, Plaintiff

/s/ Melody A. Kramer

Melody A. Kramer, Esq.
J. Michael Kaler, Esq.
Attorneys for Plaintiff

PROOF OF SERVICE

I, Melody A. Kramer, declare: I am and was at the time of this service working within in the County of San Diego, California. I am over the age of 18 year and not a party to the within action. My business address is the Kramer Law Office, Inc., 9930 Mesa Rim Road, Suite 1600, San Diego, California, 92121.

On Wednesday, March 12, 2008 , I served the following documents:

REPLY TO COUNTERCLAIM OF ONE WORLD TECHNOLOGIES, INC.

PERSON(S) SERVED	PARTY(IES) SERVED	METHOD OF SERVICE
Roger G. Perkins, Esq Angela Kim, Esq. MORRIS POLICH & PURDY LLP 501 West Broadway, Suite 500 San Diego, California 92101 rperkins@mpplaw.com akim@mpplaw.com	One World Technologies, Inc.	Email - Pleadings Filed with the Court via ECF
Orlando F. Cabanday HENNELLY & GROSSFELD LLP 4640 Admiralty Way, Suite 850 Marina del Rey, CA 90292 Telephone: (310) 305-2100 Facsimile: (310) 305-2116 ocabanday@hgla.com	Emerson Electric Co., Ridge Tool Co., and Ridgid, Inc.	Email - Pleadings Filed with the Court via ECF

☐ (Personal Service) I caused to be personally served in a sealed envelope hand-delivered to the office of counsel during regular business hours.

☐ (Federal Express) I deposited or caused to be deposited today with Federal Express in a sealed envelope containing a true copy of the foregoing documents with fees fully prepaid addressed to the above noted addressee for overnight delivery.

☐ (Facsimile) I caused a true copy of the foregoing documents to be transmitted by facsimile machine to the above noted addressees. The facsimile transmissions were

reported as complete and without error.

☐ (Email) I emailed a true copy of the foregoing documents to an email address represented to be the correct email address for the above noted addressee.

☒ (Email--Pleadings Filed with the Court) Pursuant to Local Rules, I electronically filed this document via the CM/ECF system for the United States District Court for the Southern District of California.

☐ (U.S. Mail) I mailed a true copy of the foregoing documents to a mail address represented to be the correct mail address for the above noted addressee.

I declare that the foregoing is true and correct, and that this declaration was executed on Wednesday, March 12, 2008, in San Diego, California.

/s/ Melody A. Kramer

Melody A. Kramer