UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DOW JONES & COMPANY, INC. 200 Liberty St. New York, New York 10281 Plaintiff, v. ABLAISE LTD 40 Queen Anne Street London W1G 9EL, United Kingdom and GENERAL INVENTIONS INSTITUTE A, INC., Craigmuir Chambers, P.O. Box 71 Town Road Tortola, British Virgin Islands Defendants.	Civil Action No. 1:06CV01014 Judge James Robertson Jury Trial Demanded

REPLY TO COUNTERCLAIMS

Plaintiff, Dow Jones & Company, Inc. (hereinafter "Dow Jones" or "Plaintiff"), replies to the counterclaims of defendants, Ablaise Ltd. ("Ablaise") and General Inventions Institute A, Inc. ("GIIA") (collectively referred to as "Defendants"), as follows:

1. This is a claim for patent infringement and arises under the patent laws of the United States, Title 35 of the United States Code. This Court has original jurisdiction over the subject matter of this Complaint under 28 U.S.C. § 1338(a).

Response

Admitted.

2. Ablaise is a British corporation.

Response

Upon information and belief, admitted.

3. GIIA is a British Virgin Islands corporation.

Response

Upon information and belief, admitted.

4. On information and belief, Plaintiff-counter-defendant Dow Jones (Counter-defendant") is a corporation organized and existing under the laws of the State of Delaware, having a principal place of business at 200 Liberty St., New York, New York 10281.

Response

Admitted.

5. Ablaise owns and has standing to sue for infringement of United States Patent Nos. 6,295,530 ("the '530 patent") entitled, "Internet Service of Differently Formatted Viewable Data Signals Including Commands for Browser Execution" and 6,961,737 (the '737 patent) entitled, "Serving Signals" (collectively with the '530 patent referred to as "the patents-in-suit").

Response

Dow Jones admits that Defendants have held themselves out to be the owners of several patents, including the '530 patent and the '737 patent, and otherwise denies the allegations of paragraph 5.

6. The '530 patent was duly and legally issued by the United States Patent and Trademark Office on September 25, 2001.

Response

Dow Jones admits that the '530 patent was issued by the United States Patent and Trademark Office on September 25, 2001, and otherwise denies the allegations of paragraph 6.

7. The '737 patent was duly and legally issued by the United States Patent and Trademark Office on November 1, 2005.

Response

Dow Jones admits that the '737 patent was issued by the United States Patent and Trademark Office on November 1, 2005, and otherwise denies the allegations of paragraph 7.

8. Counter-defendants have infringed one or more claims of the patents-in-suit by making, using, and operating the www.wsj.com and www.marketwatch.com websites throughout the United States, including this judicial district.

Response

Denied.

9. Counter-defendants have continued to engage in their infringing activities even after receiving notice of the patents-in-suit and their infringement of such patents.

Response

Denied.

10. Counter-defendants' infringement of the patents-in-suit will continue unless enjoined by this Court.

Response

Denied.

11. Ablaise has been damaged by the infringing acts of Counter-defendants.

Response

Denied.

12. Ablaise will continue to be damaged unless and until Counter-defendants are restrained from their infringing acts by this Court.

Response

Denied.

AFFIRMATVE DEFENSES

Dow Jones asserts the following affirmative defenses:

1. Defendants cannot seek damages relating to the activities of Dow Jones prior to February 6, 2006.

2. The Defendants' counterclaims fail to state claims upon which relief may be granted.

3. Dow Jones generally denies that Defendants are entitled to any of the relief requested in the counterclaims.

4. Dow Jones denies each and every allegation of the counterclaims not specifically admitted herein.

5. The '530 and '737 patent are invalid.

6. Dow Jones reserves the right to raise such other and further defenses as may appear appropriate in the further course of this litigation.

WHEREFORE, Dow Jones prays for judgment:

a) Dismissing Defendants' counterclaims with prejudice;

b) Awarding to Dow Jones the relief sought in its complaint;

c) Awarding to Dow Jones their costs, attorneys' fees and expenses incurred in this action; and

d) Awarding to Dow Jones such further necessary or proper relief as the Court deems just and appropriate.

Date: August 4, 2006

Respectfully submitted,

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing REPLY TO COUNTERCLAIMS was served on this 7th day of August, 2006 via electronic and first class mail upon the following counsel of record:

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/s/ Steven Lieberman
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