UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DOW JONES REUTERS BUSINESS INTERACTIVE, LLC d/b/a FACTIVA,	)	
Plaintiff,	)	**CASE NUMBER 1:06cv01015-JR**
v.	)	
ABLAISE LTD. and GENERAL INVENTIONS INSTITUTE A, INC.,	)	
Defendants.	)	

PLAINTIFF'S REPLY TO DEFENDANTS' COUNTERCLAIMS

Plaintiff Dow Jones Reuters Business Interactive, LLC, d/b/a Factiva ("Factiva"), for its reply to Defendants' Counterclaims, admits, denies, and alleges 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:

Admits that the counterclaim purports to be a patent infringement claim arising under the patent laws of the United States, denies that Defendants are entitled to maintain their counterclaims or to any relief, states that the remaining allegations are legal conclusions to which not admission or denial is necessary, and denies any remaining allegations.

2. Ablaise is a British corporation.

RESPONSE:

Admits.

3. GIIA is a British Virgin Islands corporation.

RESPONSE:

Admits.

4 On information and belief, Plaintiff-counter-defendant Factiva ("Counter-defendant") is a limited liability company organized and existing under the laws of the State of Delaware, having a principal place of business at U.S. Route One at Ridge Road, Bldg. 5, Monmouth Junction, NJ 08852.

RESPONSE:

Admits.

5 Ablaise owns and has standing to sue for infringement of United States Patent No. 6,961,737 ("the '737 patent") entitled, "Serving Signals."

RESPONSE:

States that it lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 5.

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

RESPONSE:

Admits that the '737 patent on its face shows an issue date of November 1, 2005.

7. Counter-defendant has infringed one or more claims of the '737 patent by making, using, and operating the global.factiva.com website throughout the United States, including this judicial district.

RESPONSE:

Denies.

8. Counter-defendant has continued to engage in their infringing activities even after receiving notice of the '737 patent and their infringement of such patent.

RESPONSE:

Denies.

9. Counter-defendant's infringement of the '737 patent will continue unless enjoined by this Court.

RESPONSE:

Denies.

10. Ablaise has been damaged by the infringing acts of Counter-defendant.

RESPONSE:

Denies.

11. Ablaise will continue to be damaged unless and until Counter-defendant is restrained from its infringing acts by this Court.

RESPONSE:

Denies.

AFFIRMATIVE DEFENSE

1. The claims of the '737 patent are invalid because they do not meet the conditions for patentability in 35 U.S.C. §§ 102, 103, and/or 112.

WHEREFORE, having fully answered the counterclaims, Factiva prays for judgment as follows:

A. Dismissal of the counterclaims in their entirety;

B. A declaration that the '737 patent is invalid;

C. A declaration that this is an exceptional case and an award to Factiva of its attorneys' fees and costs under 35 U.S.C. § 285; and

D. Such other relief as the Court deems just and equitable.

Respectfully submitted,

Dated: October 2, 2006

/s/ Creighton R. Magid
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Counsel For Plaintiff
DOW JONES REUTERS BUSINESS
INTERACTIVE, LLC d/b/a FACTIVA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of October, 2006, a copy of the foregoing PLAINTIFF'S REPLY TO DEFENDANTS' COUNTERCLAIMS was sent by first-class mail, postage prepaid to:

Amy S. Owen, Esquire
Cochran & Owen
8000 Towers Crescent Drive, Suite 160
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Thomas G. Scavone, Esquire
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/s/ Creighton R. Magid
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