IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SAFETY BRAKING CORPORATION, MAGNETAR TECHNOLOGIES CORP., and G&T CONVEYOR CO., Plaintiffs, v. SIX FLAGS THEME PARKS INC., TIERCO MARYLAND, INC., GREAT AMERICA LLC, KKI, LLC, MAGIC MOUNTAIN LLC, PARK MANAGEMENT CORP., RIVERSIDE PARK ENTERPRISES, INC., SIX FLAGS OVER GEORGIA II, L.P., SIX FLAGS ST. LOUIS LLC, TEXAS FLAGS, LTD., ASTROWORLD, L.P., DARIEN LAKE THEME PARK AND CAMPING RESORT, INC., ELITCH GARDENS, L.P., BUSCH ENTERTAINMENT CORP., CEDAR FAIR LP, PARAMOUNT PARKS, INC., KNOTT'S BERRY FARM, KINGS ISLAND COMPANY, CEDAR FAIR, UNIVERSAL CITY DEVELOPMENT PARTNERS LTD., UNIVERSAL CITY STUDIOS LLLP, Defendants.	Civil Action No. 07-127-***

PLAINTIFFS' REPLY TO COUNTERCLAIMS OF BUSCH ENTERTAINMENT CORP.

Plaintiffs and Counterclaim Defendants Safety Braking Corp. ("Safety Braking"), Magnetar Technologies Corp. ("Magnetar"), and G&T Conveyor Co. ("G&T") (collectively "Plaintiffs") reply as follows to the counterclaims in the DEFENDANT BUSCH ENTERTAINMENT CORP.'S ANSWER AND COUNTERCLAIM TO PLAINTIFFS' FIRST AMENDED COMPLAINT (hereafter "the Counterclaims") filed in this action:

PARTIES

40. Plaintiffs admit the specific allegation of Paragraph 40 of the Counterclaims.

41. Plaintiffs admit the specific allegation of Paragraph 41 of the Counterclaims.

42. Plaintiffs admit the specific allegation of Paragraph 42 of the Counterclaims.

43. Plaintiffs admit the specific allegation of Paragraph 43 of the Counterclaims.

JURISDICTION AND VENUE

44. Plaintiffs admit the specific allegation of Paragraph 44 of the Counterclaims.

45. Plaintiffs admit the specific allegation of Paragraph 45 of the Counterclaims.

ACTUAL CASE OR CONTROVERSY

46. Plaintiffs admit the specific allegation of Paragraph 46 of the Counterclaims.

47. Plaintiffs admit the specific allegation of Paragraph 47 of the Counterclaims.

48. Plaintiffs deny each and every allegation of Paragraph 48 of the Counterclaims.

49. Plaintiffs admit that the `125 patent says what it says and that the patent contains the words "undue stress on the cars and tracks themselves due to an electromagnetic force created between the car and the motor". Plaintiffs deny each and every remaining and other allegation of Paragraph 49 of the Counterclaims.

50. Plaintiffs admit that the `125 patent says what it says and that the patent describes one or more magnet configurations. Plaintiffs deny each and every remaining and other allegation of Paragraph 50 of the Counterclaims.

51. Plaintiffs admit the specific allegation of Paragraph 51 of the Counterclaims.

52. Plaintiffs deny each and every allegation of Paragraph 52 of the Counterclaims.

53. Plaintiffs are informed and believe, and on that basis admit, that a person using the name Kwangho Chung has been a consultant to BAE Systems. Plaintiffs deny each and every remaining and other allegation of Paragraph 53 of the Counterclaims.

54. Plaintiffs deny each and every allegation of Paragraph 54 of the Counterclaims.

55. Plaintiffs deny each and every allegation of Paragraph 55 of the Counterclaims.

56. Plaintiffs deny each and every allegation of Paragraph 56 of the Counterclaims.

57. Plaintiffs deny each and every allegation of Paragraph 57 of the Counterclaims.

58. The allegation of Paragraph 58 is a legal conclusion to which no response is required.

FIRST COUNTERCLAIM FOR RELIEF

59. Plaintiffs incorporate their responses to Paragraphs 40 through 58 as though fully set forth herein.

60. Plaintiffs deny each and every allegation of Paragraph 60 of the Counterclaims.

61. Plaintiffs deny each and every allegation of Paragraph 61 of the Counterclaims.

62. Plaintiffs deny each and every allegation of Paragraph 62 of the Counterclaims.

63. Plaintiffs deny each and every allegation of Paragraph 63 of the Counterclaims.

WHEREFORE, the Plaintiffs and Counterclaim Defendants request the following relief:

A. That the Counterclaims be dismissed with prejudice.

B. That all relief prayed for by Counterclaim Plaintiffs be denied.

C. That the relief requested by Plaintiffs and Counterclaim Defendants in the Complaint herein be granted.

D. For such other and further relief that this Court may deem just and proper.

/s/ Francis DiGiovanni
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Dated: September 12, 2007

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to counsel of record on the Court's CM/ECF registrants for this case. I further certify that on September 12, 2007, I caused a copy of the foregoing document to be served upon the following in the manner indicated:

BY E-MAIL AND HAND DELIVERY

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