IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

FLASHPOINT TECHNOLOGY, INC.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	C.A. No. 08-140-GMS
	§	
AT&T MOBILITY, LLC, D/B/A CINGULAR WIRELESS, HTC AMERICA, INC., HTC CORP., KYOCERA WIRELESS CORP., KYOCERA CORP., LG ELECTRONICS USA, INC., LG ELECTRONICS, INC., MOTOROLA, INC., NOKIA, INC., NOKIA CORP., PALM, INC., RESEARCH IN MOTION CORP., RESEARCH IN MOTION LTD., SPRINT SPECTRUM L.P., D/B/A SPRINT PCS, T-MOBILE USA, INC., and CELLCO PARTNERSHIP, D/B/A VERIZON WIRELESS,	§	**JURY TRIAL DEMANDED**
	§	
Defendants	§	

PLAINTIFF'S REPLY TO LG ELECTRONICS, INC.'S COUNTERCLAIMS

Plaintiff FlashPoint Technology, Inc. ("FlashPoint") hereby responds to each paragraph of LG Electronics, Inc. ("LGE") Counterclaims as follows:

PARTIES

1. Upon information and belief, admitted.

2. Admitted.

JURISDICTION AND VENUE

3. Admitted.

4. Admitted.

FIRST COUNTERCLAIM

5. FlashPoint incorporates its Original Complaint and the replies set forth to Paragraphs 1-4 above as if fully set forth herein.

6. Denied.

7. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 7 and therefore denies same.

8. Denied.

9. Denied.

10. Denied.

11. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 11 and therefore denies same.

12. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 12 and therefore denies same.

13. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 13 and therefore denies same.

14. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 14 and therefore denies same.

15. Denied.

SECOND COUNTERCLAIM

16. FlashPoint incorporates its Original Complaint and the replies set forth to Paragraphs 1-15 above as if fully set forth herein.

17. Denied.

18. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 18 and therefore denies same.

19. Denied.

20. Denied.

21. Denied.

22. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 22 and therefore denies same.

23. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 23 and therefore denies same.

24. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 24 and therefore denies same.

25. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 25 and therefore denies same.

26. Denied.

THIRD COUNTERCLAIM

27. FlashPoint incorporates its Original Complaint and the replies set forth to Paragraphs 1-26 above as if fully set forth herein.

28. Denied.

29. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 29 and therefore denies same.

30. Denied.

31. Denied.

32. Denied.

33. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 33 and therefore denies same.

34. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 34 and therefore denies same.

35. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 35 and therefore denies same.

36. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 36 and therefore denies same.

37. Denied.

FOURTH COUNTERCLAIM

38. FlashPoint incorporates its Original Complaint and the replies set forth to Paragraphs 1-27 above as if fully set forth herein.

39. Denied.

40. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 40 and therefore denies same.

41. Denied.

42. Denied.

43. Denied.

44. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 44 and therefore denies same.

45. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 45 and therefore denies same.

46. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 46 and therefore denies same.

47. FlashPoint is without sufficient information or knowledge to form a belief as to the truth or falsity of the allegations of Paragraph 47 and therefore denies same.

48. Denied.

FIFTH COUNTERCLAIM

49. FlashPoint incorporates its Original Complaint and the replies set forth to Paragraphs 1-48 above as if fully set forth herein.

50. Denied.

SIXTH COUNTERCLAIM

51. FlashPoint incorporates its Original Complaint and the replies set forth to Paragraphs 1-50 above as if fully set forth herein.

52. Denied.

SEVENTH COUNTERCLAIM

53. FlashPoint incorporates its Original Complaint and the replies set forth to Paragraphs 1-52 above as if fully set forth herein.

54. Denied.

EIGHTH COUNTERCLAIM

55. FlashPoint incorporates its Original Complaint and the replies set forth to Paragraphs 1-54 above as if fully set forth herein.

56. Denied.

EXCEPTIONAL CASE

57. Denied.

JURY DEMAND

58. No response to Paragraph 58 is required.

PRAYER FOR RELIEF

In addition to the relief requested in Plaintiff's Original Complaint, Plaintiff respectfully requests a judgment as follows against LGE as follows:

A. That LGE takes nothing by its Counterclaims;

B. That the Court award Plaintiff costs and attorneys' fees incurred in defending against these Counterclaims; and

C. Any and all further relief for Plaintiff as the Court may deem just and proper.

JURY DEMAND

Plaintiff demands a trial by jury on all issues.

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Dated: July 1, 2008

/s/ Evan O. Williford

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CERTIFICATE OF SERVICE

I, Evan O. Williford, hereby certify that on July 1, 2008, I caused to be electronically filed a true and correct copy of the foregoing document – **Plaintiff's Reply to LG Electronics, Inc.'s Counterclaims** – with the Clerk of Court using CM/ECF which will send notification of such filing to the following local counsel for defendants:

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