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 RESEARCH IN MOTION LTD.'S COUNTERCLAIMS

Plaintiff FlashPoint Technology, Inc. ("FlashPoint") hereby responds to each paragraph of Research In Motion Ltd.'s ("RIM Ltd.") Counterclaims as follows:

PARTIES

1. Upon information and belief, admitted.

2. Admitted.

JURISDICTION AND VENUE

3. Admitted that RIM Ltd. purports to state a counterclaim for invalidity and non-infringement of the patents-in-suit, that this Court has subject matter jurisdiction over RIM Ltd.'s counterclaims pursuant to 28 U.S.C. §§ 2201-2202, 1331 and 1338, that a real, immediate and justiciable controversy exists between RIM Ltd. and FlashPoint relating to the validity of one or more of the patents-in-suit and the infringement of one or more claims of the patents-in-suit by

RIM Ltd., and that RIM Ltd. has infringed one or more claims of the patents-in-suit, but otherwise denied.

4. Admitted.

COUNT 1: DECLARATORY JUDGMENT OF PATENT INVALIDITY

5. FlashPoint incorporates the replies set forth to Paragraphs 1-4 as if fully set forth herein.

6. Denied.

7. Admitted.

COUNT 2: DECLARATORY JUDGMENT OF NON-INFRINGEMENT

8. FlashPoint incorporates the replies set forth to Paragraphs 1-7 as if fully set forth herein.

9. Denied.

10. Admitted.

COUNT 3: ATTORNEY FEES AND COSTS

11. FlashPoint incorporates the replies set forth to Paragraphs 1-10 as if fully set forth herein.

12. Denied.

JURY DEMAND

13. No response to Paragraph 13 is required.

PRAYER FOR RELIEF

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

A. That RIM Ltd. 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.

/s/ Evan O. Williford
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Dated: May 20, 2008

CERTIFICATE OF SERVICE

I, Evan O. Williford, hereby certify that on May 20, 2008, I caused to be electronically filed a true and correct copy of the foregoing document – **Plaintiff's Reply to Research in Motion Ltd.'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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