IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ROUND ROCK RESEARCH, LLC, Plaintiff, v. MACY'S RETAIL HOLDINGS, INC., Defendant.	Civil Action No. 1:11-cv-01237-RGA **JURY TRIAL DEMANDED**

PLAINTIFF'S ANSWER TO DEFENDANT'S COUNTERCLAIMS

Plaintiff Round Rock Research, LLC ("Round Rock") hereby answers the Counterclaims of Defendant Macy's Retail Holdings, Inc. ("Macy's") as follows:

COUNTERCLAIMS

1. Round Rock incorporates and realleges the allegations of its Complaint and denies the allegations in each of Macy's affirmative defenses.

2. Round Rock admits the allegations in paragraph 2 of the Counterclaims.

3. Round Rock admits the allegations in paragraph 3 of the Counterclaims.

4. Round Rock admits the allegations in paragraph 4 of the Counterclaims.

5. Round Rock admits the allegations in paragraph 5 of the Counterclaims.

6. Round Rock admits the allegations in paragraph 6 of the Counterclaims.

7. Round Rock admits the allegations in paragraph 7 of the Counterclaims.

COUNT I
(Declaratory Judgment of Non-infringement)

8. With respect to paragraph 8 of the Counterclaims, Round Rock incorporates and realleges its responses to the allegations in paragraphs 1-7 of the Counterclaims.

9. Round Rock admits the allegations in paragraph 9 of the Counterclaims.

10. Round Rock denies the allegations in paragraph 10 of the Counterclaims.

COUNT II
(Declaratory Judgment of Invalidity)

11. With respect to paragraph 11 of the Counterclaims, Round Rock incorporates and realleges its responses to the allegations in paragraphs 1-10 of the Counterclaims.

12. Round Rock admits the allegations in paragraph 12 of the Counterclaims.

13. Round Rock denies the allegations in paragraph 13 of the Counterclaims.

REPLY TO MACY'S PRAYER FOR RELIEF

Round Rock denies that Macy's is entitled to any relief whatsoever in this litigation, either as prayed for in Macy's Counterclaims or otherwise. Round Rock further denies each and every allegation contained in Macy's Counterclaims to which Round Rock has not specifically responded.

JURY DEMAND

Round Rock hereby demands a trial by jury on all issues so triable.

Dated: March 8, 2012

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