IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TELCORDIA TECHNOLOGIES, INC., *Plaintiff,* *Counterclaim-Defendant,* vs. ALCATEL USA, INC., *Defendant,* *Counterclaim-Plaintiff.*	Case No. 04-CV-874 GMS **JURY TRIAL DEMANDED**

ALCATEL USA'S REPLY TO
TELCORDIA'S COUNTERCLAIM

Alcatel USA, Inc. ("Alcatel") hereby requests a trial by jury of all issues so triable and responds to each of the numbered paragraphs of Telcordia's Counterclaim, set forth in Telcordia's Reply to Alcatel USA, Inc.'s Amended [sic] Counterclaims and Demand for Jury Trial, as follows:

PARTIES

1. Alcatel lacks knowledge or information sufficient to form a belief as to the truth or correctness of the allegations set forth in Paragraph 84 of Telcordia's Counterclaim and therefore denies the allegations.

2. Alcatel denies that its Counterclaims were "Amended." Alcatel admits that it is a corporation organized and existing under the laws of Delaware, having a business address at 3400 W. Plano Parkway, Plano, Texas but states that its zip code is 75075, not 7075.

JURISDICTION AND VENUE

3. Alcatel admits that Telcordia's Counterclaim contains averments for declaratory judgment of non-infringement and invalidity of United States Patent No. 6,247,052.

4. Alcatel admits that 28 U.S.C. §§ 1331, 1338, 1367, 2201, and 2202 grant this Court subject matter jurisdiction over civil actions arising under the patent laws of the United States.

5. Alcatel denies that its Counterclaims were "Amended." For purposes of this litigation only, Alcatel does not contest that this Court has personal jurisdiction over Alcatel.

6. For purposes of this litigation only, Alcatel does not contest that venue is proper under 28 U.S.C. § 1391(b), (c) and § 1400(b).

COUNT I: DECLARATION OF NON-INFRINGEMENT AND INVALIDITY

7. Paragraph 90 of Telcordia's Counterclaim realleges and incorporates by reference Paragraphs 83-89 of the Counterclaim. Thus, Alcatel answers Paragraph 90 in the same manner it answered Paragraphs 83-89.

8. Alcatel admits the allegations set forth in Paragraph 91 of Telcordia's Counterclaim.

9. Alcatel denies the allegations set forth in Paragraph 92 of Telcordia's Counterclaim.

10. Alcatel denies the allegations set forth in Paragraph 93 of Telcordia's Counterclaim.

11. Alcatel denies the allegations set forth in Paragraph 94 of Telcordia's Counterclaim.

PRAYER FOR RELIEF

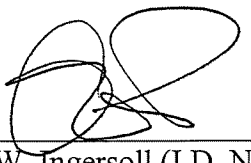
WHEREFORE, Alcatel respectfully requests that judgment be entered in its favor on Telcordia's Counterclaim and that Telcordia be denied any relief based on its Counterclaim, including the relief requested in Paragraphs A through D of its Prayer for Relief Regarding Telcordia's Counterclaim.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Alcatel requests a trial by jury of all issues so triable.

Dated: October 19, 2005

Respectfully submitted:



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CERTIFICATE OF SERVICE

I, Adam W. Poff, Esquire hereby certify that on October 19, 2005, 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 the following counsel of record:

Steven J. Balick, Esquire
Ashby & Geddes
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Wilmington, DE 19801

I further certify that on October 19, 2005, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

BY E-MAIL

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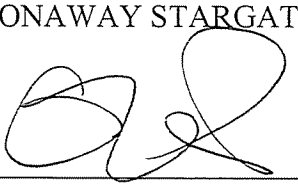

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