

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THE UNIVERSITY OF ILLINOIS FOUNDATION,)
Plaintiff and)
Counterclaim Defendant,)
v.)
BLONDER-TONGUE LABORATORIES, INC.,) Civil Action
Defendant and)
Counterclaimant,) No. 66 C 567
v.)
JFD ELECTRONICS CORPORATION,)
Counterclaim Defendant.)

COUNTERCLAIM DEFENDANT'S REPLY TO AMENDED
COUNTERCLAIM OF COUNTERCLAIMANT, AND CROSS-CLAIM

Counterclaim defendant, JFD ELECTRONICS CORPORATION (JFD),
replies to the Amended Counterclaim as follows:

Resume, Introductory paragraph to Amended Counterclaim:
Reallegation of paragraphs 1, 2 and 3 of the Counterclaim.

JFD realleges its replies to paragraphs 1, 2 and 3 of
the Counterclaim.

COUNT I - For Unfair Competition

Resume, Paragraph 4: Reallegation of paragraph 4 of
Counterclaim.

JFD realleges its reply to paragraph 4 of the Counterclaim.

Resume, Paragraph 5: The Foundation has exclusively licensed JFD under Isbell Patent No. 3,210,767 and Mayes, et al. Patent Re. 25,740 in certain fields.

JFD admits that it is an exclusive licensee under said patents in the field of receiving antennas for television and FM broadcasting on a royalty basis. All of the other allegations are denied.

Resume, Paragraph 6: The Foundation has the primary responsibility of policing the patents and aiding the commercial sales of antennas by JFD.

JFD admits that under the terms of the license agreement with the Foundation, the Foundation has the initial responsibility with respect to policing of patents against infringement and denies all of the other allegations.

Resume, Paragraph 7: The Foundation and JFD have conspired to restrain competition.

The allegations of this paragraph including sub-paragraphs (a) through (j) are denied.

COUNT II - Anti-Trust

Resume, Paragraphs 8 and 9: Paragraphs 8 and 9 of the Counterclaim are realleged.

JFD realleges its replies to paragraphs 8 and 9 of the Counterclaim and reasserts by way of separate and alternative defenses to Count II the defenses asserted in its reply to the Counterclaim.

COUNT III - Patent Infringement

Resume, Paragraphs 10 through 13: Paragraphs 10 through 13 of the Counterclaim are realleged.

JFD realleges its replies to paragraphs 10 through 13 of the Counterclaim.

Resume, Paragraph 14: JFD and the Foundation infringe Patent 3,259,904.

The allegations of paragraph 14 are denied.

Further answering the Amended Counterclaim and for its further and additional defenses, counterclaim defendant reasserts paragraphs A through G (second occurrence) of its reply to the Counterclaim.

COUNTS IV AND V - Declaratory Judgment

JFD is without sufficient knowledge or information to form a belief as to the truth of the allegations of the paragraphs of Counts IV and V.

WHEREFORE, JFD prays that the Amended Counterclaim be dismissed with costs awarded to JFD and for such other and further relief as the Court may deem just and proper.

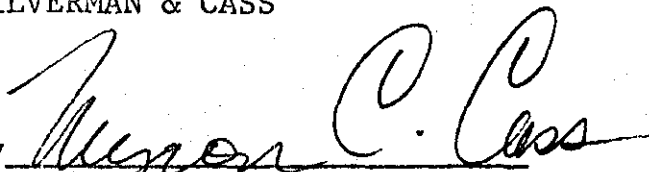
CROSS-CLAIM

Counterclaim defendant realleges all of the paragraphs of its Cross-Claim to the Counterclaim as herein filed,

including the prayer for relief as stated therein.

SILVERMAN & CASS

By


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Defendant

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Counterclaim Defendant's Reply to Amended Counterclaim of Counterclaimant, and Cross-Claim was mailed by first-class-mail this 30th day of January, 1967, to each of the following:

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