

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

Parallel Networks, LLC,

Plaintiff,

v.

Adidas America, Inc.; Adidas Interactive, Inc.;
Aeropostale, Inc.; American Girl, LLC;
American Suzuki Motor Corporation; Andersen
Corp.; Andersen Windows, Inc.; Asics America
Corp.; AT&T Inc.; BBY Solutions, Inc.;
Bergdorfgoodman.Com, LLC; BestBuy.com,
LLC; Bloomingdale's, Inc.; Briggs & Stratton
Corporation; Briggs & Stratton Power Products
Group, LLC; Brunswick Billiards, Inc.;
Brunswick Corp.; Chico's Retail Services, Inc.;
Citizen Watch Co. of America, Inc.; Dillard's,
Inc.; Eastman Kodak Company; General Motors
LLC; The Gillette Company; The Goodyear
Tire & Rubber Company; H-D Michigan, Inc.;
Harley-Davidson, Inc.; Hasbro, Inc.; Hayneedle,
Inc.; Herman Miller, Inc.; HSN Interactive LLC;
HSN LP; The J. Jill Group, Inc.; Jill Acquisition
LLC; Jones Investment Company, Inc.; Jones
Retail Corporation; Kodak Imaging Network,
Inc.; Kohl's Department Stores, Inc.; LG
Electronics USA, Inc.; Macy's West Stores, Inc.;
Macys.com, Inc.; Mattel, Inc.; Mitsubishi Motor
Sales Of America, Inc.; Mitsubishi Motors North
America, Inc.; Motorola, Inc.; Motorola
Trademark Holdings, LLC; Nautica Apparel,
Inc.; Nautica Retail USA, Inc.; Navistar, Inc.;
New Balance Athletic Shoe, Inc.; Nissan North
America, Inc.; PRL USA Holdings, Inc.; The
Procter & Gamble Company; Ralph Lauren
Media LLC; Russell Brands, LLC; Subaru Of
America, Inc.; Sunglass Hut Trading, LLC;
Victoria's Secret; Wolverine World Wide, Inc.;
Women's Apparel Group, LLC D/B/A Boston
Apparel Group, LLC,

Defendants.

CIVIL ACTION NO. 6:10-cv-00491-LED

DEMAND FOR JURY TRIAL

**DEFENDANTS EASTMAN KODAK
COMPANY AND KODAK IMAGING
NETWORK, INC. ANSWER TO
COMPLAINT**

**DEFENDANTS EASTMAN KODAK COMPANY'S AND
KODAK IMAGING NETWORK, INC.'S ANSWER TO COMPLAINT**

Pursuant to Rules 8 and 12 of the Federal Rules of Civil Procedure and the Local Rules of this Court, Defendants Eastman Kodak Company and Kodak Imaging Networks, Inc. (collectively, "Kodak") answer the allegations in Plaintiff Parallel Networks, LLC's ("Parallel's") Complaint as follows:

THE PARTIES

1. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1 of the Complaint.
2. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 2 of the Complaint.
3. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 3 of the Complaint.
4. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 4 of the Complaint.
5. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of the Complaint.
6. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 6 of the Complaint.
7. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 7 of the Complaint.
8. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 8 of the Complaint.

9. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 9 of the Complaint.

10. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of the Complaint.

11. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 11 of the Complaint.

12. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 12 of the Complaint.

13. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 13 of the Complaint.

14. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 14 of the Complaint.

15. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 15 of the Complaint.

16. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 16 of the Complaint.

17. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 17 of the Complaint.

18. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 18 of the Complaint.

19. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 19 of the Complaint.

20. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 20 of the Complaint.

21. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 21 of the Complaint.

22. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 21 of the Complaint.

23. Kodak admits the allegations contained in paragraph 23 of the Complaint.

24. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 24 of the Complaint.

25. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 25 of the Complaint.

26. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 26 of the Complaint.

27. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 27 of the Complaint.

28. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 28 of the Complaint.

29. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 29 of the Complaint.

30. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 30 of the Complaint.

31. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 31 of the Complaint.

32. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 32 of the Complaint.

33. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 33 of the Complaint.

34. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 34 of the Complaint.

35. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 35 of the Complaint.

36. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 36 of the Complaint.

37. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 37 of the Complaint.

38. Kodak admits the allegations contained in paragraph 38 of the Complaint.

39. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 39 of the Complaint.

40. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 40 of the Complaint.

41. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 41 of the Complaint.

42. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 42 of the Complaint.

43. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 43 of the Complaint.

44. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 44 of the Complaint.

45. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 45 of the Complaint.

46. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 46 of the Complaint.

47. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 47 of the Complaint.

48. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 48 of the Complaint.

49. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 49 of the Complaint.

50. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 50 of the Complaint.

51. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 51 of the Complaint.

52. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 52 of the Complaint.

53. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 53 of the Complaint.

54. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 54 of the Complaint.

55. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 55 of the Complaint.

56. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 56 of the Complaint.

57. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 57 of the Complaint.

58. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 58 of the Complaint.

59. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 59 of the Complaint.

60. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 60 of the Complaint.

61. Kodak is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 61 of the Complaint.

JURISDICTION AND VENUE

62. Kodak admits that the Complaint purports to set forth a cause of action for patent infringement. Kodak denies that it has made or used the alleged invention of the patent-in-suit, or that it has infringed any claims of the patent-in-suit. Kodak is not required to answer the remainder of the allegations in paragraph 62 of the Complaint because they purport to set forth legal conclusions.

63. Kodak denies that it has “engaged in... infringing acts” in this district or any other judicial district. Kodak is not required to respond to allegations in paragraph 63 of the Complaint relating to contributory or induced infringement because it has filed concurrently herewith a Motion to Dismiss Parallel’s claims of contributory and induced infringement. Kodak is not

required to answer the remainder of the allegations in paragraph 63 of the Complaint because they purport to set forth legal conclusions.

COUNT I: INFRINGEMENT OF UNITED STATES PATENT NO. 6,446,111

64. Kodak admits that U.S. Patent No. 6,446,111 (“the ‘111 patent”) is titled on its face “Method and Apparatus for Client-Server Communication Using a Limited Capability Client Over a Low-Speed Communications Link” and that the patent has on its face an issue date of September 3, 2002. Kodak denies that the ‘111 was duly and legally issued by the United States Patent and Trademark Office.

65. Kodak denies that Parallel Networks, LLC is listed on the face of the ‘111 patent as the assignee of the patent. Kodak is not required to answer the remainder of the allegations of paragraph 65 insofar as they call for a legal conclusions.

66. Kodak is not required to answer the allegations in paragraph 66 insofar as they call for a legal conclusion. To the extent a response is required, the claims of the ‘111 Patent speak for themselves.

67. Kodak is not required to answer the allegations in paragraph 67 of the Complaint because they are directed to defendants other than Kodak.

68. Kodak is not required to answer the allegations in paragraph 68 of the Complaint because they are directed to defendants other than Kodak.

69. Kodak is not required to answer the allegations in paragraph 69 of the Complaint because they are directed to defendants other than Kodak.

70. Kodak is not required to answer the allegations in paragraph 70 of the Complaint because they are directed to defendants other than Kodak.

71. Kodak is not required to answer the allegations in paragraph 71 of the Complaint because they are directed to defendants other than Kodak.

72. Kodak is not required to answer the allegations in paragraph 72 of the Complaint because they are directed to defendants other than Kodak.

73. Kodak is not required to answer the allegations in paragraph 73 of the Complaint because they are directed to defendants other than Kodak.

74. Kodak is not required to answer the allegations in paragraph 74 of the Complaint because they are directed to defendants other than Kodak.

75. Kodak is not required to answer the allegations in paragraph 75 of the Complaint because they are directed to defendants other than Kodak.

76. Kodak is not required to answer the allegations in paragraph 76 of the Complaint because they are directed to defendants other than Kodak.

77. Kodak is not required to answer the allegations in paragraph 77 of the Complaint because they are directed to defendants other than Kodak.

78. Kodak is not required to answer the allegations in paragraph 78 of the Complaint because they are directed to defendants other than Kodak.

79. Kodak is not required to answer the allegations in paragraph 79 of the Complaint because they are directed to defendants other than Kodak.

80. Kodak is not required to answer the allegations in paragraph 80 of the Complaint because they are directed to defendants other than Kodak.

81. Kodak is not required to answer the allegations in paragraph 81 of the Complaint because they are directed to defendants other than Kodak.

82. Kodak is not required to answer the allegations in paragraph 82 of the Complaint because they are directed to defendants other than Kodak.

83. Kodak is not required to answer the allegations in paragraph 83 of the Complaint because they are directed to defendants other than Kodak.

84. Kodak is not required to answer the allegations in paragraph 84 of the Complaint because they are directed to defendants other than Kodak.

85. Kodak is not required to answer the allegations in paragraph 85 of the Complaint because they are directed to defendants other than Kodak.

86. Kodak is not required to answer the allegations in paragraph 86 of the Complaint because they are directed to defendants other than Kodak.

87. Kodak is not required to answer the allegations in paragraph 87 of the Complaint because they are directed to defendants other than Kodak.

88. Kodak is not required to answer the allegations in paragraph 88 of the Complaint because they are directed to defendants other than Kodak.

89. Kodak is not required to answer the allegations in paragraph 89 of the Complaint because they are directed to defendants other than Kodak.

90. Kodak is not required to answer the allegations in paragraph 90 of the Complaint because they are directed to defendants other than Kodak.

91. Kodak is not required to answer the allegations in paragraph 91 of the Complaint because they are directed to defendants other than Kodak.

92. Kodak is not required to answer the allegations in paragraph 92 of the Complaint because they are directed to defendants other than Kodak.

93. Kodak is not required to answer the allegations in paragraph 93 of the Complaint because they are directed to defendants other than Kodak.

94. Kodak is not required to answer the allegations in paragraph 94 of the Complaint because they are directed to defendants other than Kodak.

95. Kodak is not required to answer the allegations in paragraph 95 of the Complaint because they are directed to defendants other than Kodak.

96. Kodak is not required to answer the allegations in paragraph 96 of the Complaint because they are directed to defendants other than Kodak.

97. Kodak is not required to answer the allegations in paragraph 97 of the Complaint because they are directed to defendants other than Kodak.

98. Kodak is not required to answer the allegations in paragraph 98 of the Complaint because they are directed to defendants other than Kodak.

99. Kodak is not required to answer the allegations in paragraph 99 of the Complaint because they are directed to defendants other than Kodak.

100. Kodak is not required to answer the allegations in paragraph 100 of the Complaint because they are directed to defendants other than Kodak.

101. Kodak is not required to answer the allegations in paragraph 101 of the Complaint because they are directed to defendants other than Kodak.

102. Kodak is not required to answer the allegations in paragraph 102 of the Complaint because they are directed to defendants other than Kodak.

103. Kodak is not required to answer the allegations in paragraph 103 of the Complaint because they are directed to defendants other than Kodak.

104. Kodak is not required to answer the allegations in paragraph 104 of the Complaint because they are directed to defendants other than Kodak.

105. Kodak is not required to answer the allegations in paragraph 105 of the Complaint because they are directed to defendants other than Kodak.

106. Kodak is not required to answer the allegations in paragraph 106 of the Complaint because they are directed to defendants other than Kodak.

107. Kodak is not required to answer the allegations in paragraph 107 of the Complaint because they are directed to defendants other than Kodak.

108. Kodak is not required to answer the allegations in paragraph 108 of the Complaint because they are directed to defendants other than Kodak.

109. Kodak is not required to answer the allegations in paragraph 109 of the Complaint because they are directed to defendants other than Kodak.

110. Kodak is not required to answer the allegations in paragraph 110 of the Complaint because they are directed to defendants other than Kodak.

111. Kodak is not required to answer the allegations in paragraph 111 of the Complaint because they are directed to defendants other than Kodak.

112. Kodak is not required to answer the allegations in paragraph 112 of the Complaint because they are directed to defendants other than Kodak.

113. Kodak is not required to answer the allegations in paragraph 113 of the Complaint because they are directed to defendants other than Kodak.

114. Kodak is not required to answer the allegations in paragraph 114 of the Complaint because they are directed to defendants other than Kodak.

115. Kodak is not required to answer the allegations in paragraph 115 of the Complaint because they are directed to defendants other than Kodak.

116. Kodak is not required to answer the allegations in paragraph 116 of the Complaint because they are directed to defendants other than Kodak.

117. Kodak is not required to answer the allegations in paragraph 117 of the Complaint because they are directed to defendants other than Kodak.

118. Kodak is not required to answer the allegations in paragraph 118 of the Complaint because they are directed to defendants other than Kodak.

119. Kodak is not required to answer the allegations in paragraph 119 of the Complaint because they are directed to defendants other than Kodak.

120. Kodak is not required to answer the allegations in paragraph 120 of the Complaint because they are directed to defendants other than Kodak.

121. Kodak is not required to answer the allegations in paragraph 121 of the Complaint because they are directed to defendants other than Kodak.

122. Kodak is not required to answer the allegations in paragraph 122 of the Complaint because they are directed to defendants other than Kodak.

123. Kodak is not required to answer the allegations in paragraph 123 of the Complaint because they are directed to defendants other than Kodak.

124. Kodak is not required to answer the allegations in paragraph 124 of the Complaint because they are directed to defendants other than Kodak.

125. Kodak is not required to answer the allegations in paragraph 125 of the Complaint because they are directed to defendants other than Kodak.

126. Kodak is not required to answer the allegations in paragraph 126 of the Complaint because they are directed to defendants other than Kodak.

127. Kodak is not required to answer the allegations in paragraph 127 of the Complaint because they are directed to defendants other than Kodak.

128. Kodak is not required to answer the allegations in paragraph 128 of the Complaint because they are directed to defendants other than Kodak.

129. Kodak is not required to answer the allegations in paragraph 129 of the Complaint because they are directed to defendants other than Kodak.

130. Kodak is not required to answer the allegations in paragraph 130 of the Complaint because they are directed to defendants other than Kodak.

131. Kodak is not required to answer the allegations in paragraph 131 of the Complaint because they are directed to defendants other than Kodak.

132. Kodak is not required to answer the allegations in paragraph 132 of the Complaint because they are directed to defendants other than Kodak.

133. Kodak is not required to answer the allegations in paragraph 133 of the Complaint because they are directed to defendants other than Kodak.

134. Kodak is not required to answer the allegations in paragraph 134 of the Complaint because they are directed to defendants other than Kodak.

135. Kodak is not required to answer the allegations in paragraph 135 of the Complaint because they are directed to defendants other than Kodak.

136. Kodak is not required to answer the allegations in paragraph 136 of the Complaint because they are directed to defendants other than Kodak.

137. Kodak is not required to answer the allegations in paragraph 137 of the Complaint because they are directed to defendants other than Kodak.

138. Kodak is not required to answer the allegations in paragraph 138 of the Complaint because they are directed to defendants other than Kodak.

139. Kodak is not required to answer the allegations in paragraph 139 of the Complaint because they are directed to defendants other than Kodak.

140. Kodak is not required to answer the allegations in paragraph 140 of the Complaint because they are directed to defendants other than Kodak.

141. Kodak is not required to answer the allegations in paragraph 141 of the Complaint because they are directed to defendants other than Kodak.

142. Kodak is not required to answer the allegations in paragraph 142 of the Complaint because they are directed to defendants other than Kodak.

143. Kodak is not required to answer the allegations in paragraph 143 of the Complaint because they are directed to defendants other than Kodak.

144. Kodak is not required to answer the allegations in paragraph 144 of the Complaint because they are directed to defendants other than Kodak.

145. Kodak is not required to answer the allegations in paragraph 145 of the Complaint because they are directed to defendants other than Kodak.

146. Kodak is not required to answer the allegations in paragraph 146 of the Complaint because they are directed to defendants other than Kodak.

147. Kodak denies that Eastman Kodak Company has infringed or is currently infringing any claim of the '111 patent in this judicial district or anywhere in the United States. Insofar as the allegations in paragraph 147 of the Complaint relate to contributory or induced infringement, Kodak is not required to respond because it has filed concurrently herewith a

Motion to Dismiss Parallel's claims of contributory and induced infringement. Kodak denies the remaining allegations in paragraph 147 of the Complaint.

148. Kodak is not required to respond to the allegations in paragraph 148 of the Complaint because it has filed concurrently herewith a Motion to Dismiss Parallel's claims of contributory and induced infringement.

149. Kodak is not required to respond to the allegations in paragraph 149 of the Complaint because it has filed concurrently herewith a Motion to Dismiss Parallel's claims of contributory and induced infringement.

150. Insofar as the allegations in paragraph 150 of the Complaint relate to contributory or induced infringement, Kodak is not required to respond because it has filed concurrently herewith a Motion to Dismiss Parallel's claims of contributory and induced infringement. Kodak denies each of the remaining allegations in paragraph 150 of the Complaint.

151. Kodak is not required to answer the allegations in paragraph 151 of the Complaint because they are directed to defendants other than Kodak.

152. Kodak is not required to answer the allegations in paragraph 152 of the Complaint because they are directed to defendants other than Kodak.

153. Kodak is not required to answer the allegations in paragraph 153 of the Complaint because they are directed to defendants other than Kodak.

154. Kodak is not required to answer the allegations in paragraph 154 of the Complaint because they are directed to defendants other than Kodak.

155. Kodak is not required to answer the allegations in paragraph 155 of the Complaint because they are directed to defendants other than Kodak.

156. Kodak is not required to answer the allegations in paragraph 156 of the Complaint because they are directed to defendants other than Kodak.

157. Kodak is not required to answer the allegations in paragraph 157 of the Complaint because they are directed to defendants other than Kodak.

158. Kodak is not required to answer the allegations in paragraph 158 of the Complaint because they are directed to defendants other than Kodak.

159. Kodak is not required to answer the allegations in paragraph 159 of the Complaint because they are directed to defendants other than Kodak.

160. Kodak is not required to answer the allegations in paragraph 160 of the Complaint because they are directed to defendants other than Kodak.

161. Kodak is not required to answer the allegations in paragraph 161 of the Complaint because they are directed to defendants other than Kodak.

162. Kodak is not required to answer the allegations in paragraph 162 of the Complaint because they are directed to defendants other than Kodak.

163. Kodak is not required to answer the allegations in paragraph 163 of the Complaint because they are directed to defendants other than Kodak.

164. Kodak is not required to answer the allegations in paragraph 164 of the Complaint because they are directed to defendants other than Kodak.

165. Kodak is not required to answer the allegations in paragraph 165 of the Complaint because they are directed to defendants other than Kodak.

166. Kodak is not required to answer the allegations in paragraph 166 of the Complaint because they are directed to defendants other than Kodak.

167. Kodak is not required to answer the allegations in paragraph 167 of the Complaint because they are directed to defendants other than Kodak.

168. Kodak is not required to answer the allegations in paragraph 168 of the Complaint because they are directed to defendants other than Kodak.

169. Kodak is not required to answer the allegations in paragraph 169 of the Complaint because they are directed to defendants other than Kodak.

170. Kodak is not required to answer the allegations in paragraph 170 of the Complaint because they are directed to defendants other than Kodak.

171. Kodak is not required to answer the allegations in paragraph 171 of the Complaint because they are directed to defendants other than Kodak.

172. Kodak is not required to answer the allegations in paragraph 172 of the Complaint because they are directed to defendants other than Kodak.

173. Kodak is not required to answer the allegations in paragraph 173 of the Complaint because they are directed to defendants other than Kodak.

174. Kodak is not required to answer the allegations in paragraph 174 of the Complaint because they are directed to defendants other than Kodak.

175. Kodak is not required to answer the allegations in paragraph 175 of the Complaint because they are directed to defendants other than Kodak.

176. Kodak is not required to answer the allegations in paragraph 176 of the Complaint because they are directed to defendants other than Kodak.

177. Kodak is not required to answer the allegations in paragraph 177 of the Complaint because they are directed to defendants other than Kodak.

178. Kodak is not required to answer the allegations in paragraph 178 of the Complaint because they are directed to defendants other than Kodak.

179. Kodak is not required to answer the allegations in paragraph 179 of the Complaint because they are directed to defendants other than Kodak.

180. Kodak is not required to answer the allegations in paragraph 180 of the Complaint because they are directed to defendants other than Kodak.

181. Kodak is not required to answer the allegations in paragraph 181 of the Complaint because they are directed to defendants other than Kodak.

182. Kodak is not required to answer the allegations in paragraph 182 of the Complaint because they are directed to defendants other than Kodak.

183. Kodak is not required to answer the allegations in paragraph 183 of the Complaint because they are directed to defendants other than Kodak.

184. Kodak is not required to answer the allegations in paragraph 184 of the Complaint because they are directed to defendants other than Kodak.

185. Kodak is not required to answer the allegations in paragraph 185 of the Complaint because they are directed to defendants other than Kodak.

186. Kodak is not required to answer the allegations in paragraph 186 of the Complaint because they are directed to defendants other than Kodak.

187. Kodak is not required to answer the allegations in paragraph 187 of the Complaint because they are directed to defendants other than Kodak.

188. Kodak is not required to answer the allegations in paragraph 188 of the Complaint because they are directed to defendants other than Kodak.

189. Kodak is not required to answer the allegations in paragraph 189 of the Complaint because they are directed to defendants other than Kodak.

190. Kodak is not required to answer the allegations in paragraph 190 of the Complaint because they are directed to defendants other than Kodak.

191. Kodak is not required to answer the allegations in paragraph 191 of the Complaint because they are directed to defendants other than Kodak.

192. Kodak is not required to answer the allegations in paragraph 192 of the Complaint because they are directed to defendants other than Kodak.

193. Kodak is not required to answer the allegations in paragraph 193 of the Complaint because they are directed to defendants other than Kodak.

194. Kodak is not required to answer the allegations in paragraph 194 of the Complaint because they are directed to defendants other than Kodak.

195. Kodak is not required to answer the allegations in paragraph 195 of the Complaint because they are directed to defendants other than Kodak.

196. Kodak is not required to answer the allegations in paragraph 196 of the Complaint because they are directed to defendants other than Kodak.

197. Kodak is not required to answer the allegations in paragraph 197 of the Complaint because they are directed to defendants other than Kodak.

198. Kodak is not required to answer the allegations in paragraph 198 of the Complaint because they are directed to defendants other than Kodak.

199. Kodak is not required to answer the allegations in paragraph 199 of the Complaint because they are directed to defendants other than Kodak.

200. Kodak is not required to answer the allegations in paragraph 200 of the Complaint because they are directed to defendants other than Kodak.

201. Kodak is not required to answer the allegations in paragraph 201 of the Complaint because they are directed to defendants other than Kodak.

202. Kodak is not required to answer the allegations in paragraph 202 of the Complaint because they are directed to defendants other than Kodak.

203. Kodak is not required to answer the allegations in paragraph 203 of the Complaint because they are directed to defendants other than Kodak.

204. Kodak is not required to answer the allegations in paragraph 204 of the Complaint because they are directed to defendants other than Kodak.

205. Kodak is not required to answer the allegations in paragraph 205 of the Complaint because they are directed to defendants other than Kodak.

206. Kodak is not required to answer the allegations in paragraph 206 of the Complaint because they are directed to defendants other than Kodak.

207. Kodak denies that Kodak Imaging Network, Inc. has infringed or is currently infringing any claim of the '111 patent in this judicial district or anywhere in the United States. Insofar as the allegations in paragraph 207 of the Complaint relate to contributory or induced infringement, Kodak is not required to respond because it has filed concurrently herewith a Motion to Dismiss Parallel's claims of contributory and induced infringement. Kodak denies the remaining allegations in paragraph 207 of the Complaint.

208. Kodak is not required to respond to the allegations in paragraph 208 of the Complaint because it has filed concurrently herewith a Motion to Dismiss Parallel's claims of contributory and induced infringement.

209. Kodak is not required to respond to the allegations in paragraph 209 of the Complaint because it has filed concurrently herewith a Motion to Dismiss Parallel's claims of contributory and induced infringement.

210. Insofar as the allegations in paragraph 210 of the Complaint relate to contributory or induced infringement, Kodak is not required to respond because it has filed concurrently herewith a Motion to Dismiss Parallel's claims of contributory and induced infringement. Kodak denies each of the remaining allegations in paragraph 210 of the Complaint.

211. Kodak is not required to answer the allegations in paragraph 211 of the Complaint because they are directed to defendants other than Kodak.

212. Kodak is not required to answer the allegations in paragraph 212 of the Complaint because they are directed to defendants other than Kodak.

213. Kodak is not required to answer the allegations in paragraph 213 of the Complaint because they are directed to defendants other than Kodak.

214. Kodak is not required to answer the allegations in paragraph 214 of the Complaint because they are directed to defendants other than Kodak.

215. Kodak is not required to answer the allegations in paragraph 215 of the Complaint because they are directed to defendants other than Kodak.

216. Kodak is not required to answer the allegations in paragraph 216 of the Complaint because they are directed to defendants other than Kodak.

217. Kodak is not required to answer the allegations in paragraph 217 of the Complaint because they are directed to defendants other than Kodak.

218. Kodak is not required to answer the allegations in paragraph 218 of the Complaint because they are directed to defendants other than Kodak.

219. Kodak is not required to answer the allegations in paragraph 219 of the Complaint because they are directed to defendants other than Kodak.

220. Kodak is not required to answer the allegations in paragraph 220 of the Complaint because they are directed to defendants other than Kodak.

221. Kodak is not required to answer the allegations in paragraph 221 of the Complaint because they are directed to defendants other than Kodak.

222. Kodak is not required to answer the allegations in paragraph 222 of the Complaint because they are directed to defendants other than Kodak.

223. Kodak is not required to answer the allegations in paragraph 223 of the Complaint because they are directed to defendants other than Kodak.

224. Kodak is not required to answer the allegations in paragraph 224 of the Complaint because they are directed to defendants other than Kodak.

225. Kodak is not required to answer the allegations in paragraph 225 of the Complaint because they are directed to defendants other than Kodak.

226. Kodak is not required to answer the allegations in paragraph 226 of the Complaint because they are directed to defendants other than Kodak.

227. Kodak is not required to answer the allegations in paragraph 227 of the Complaint because they are directed to defendants other than Kodak.

228. Kodak is not required to answer the allegations in paragraph 228 of the Complaint because they are directed to defendants other than Kodak.

229. Kodak is not required to answer the allegations in paragraph 229 of the Complaint because they are directed to defendants other than Kodak.

230. Kodak is not required to answer the allegations in paragraph 230 of the Complaint because they are directed to defendants other than Kodak.

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298. Kodak is not required to answer the allegations in paragraph 298 of the Complaint because they are directed to defendants other than Kodak.

299. Kodak is not required to answer the allegations in paragraph 299 of the Complaint because they are directed to defendants other than Kodak.

300. Kodak is not required to answer the allegations in paragraph 300 of the Complaint because they are directed to defendants other than Kodak.

301. Kodak is not required to answer the allegations in paragraph 301 of the Complaint because they are directed to defendants other than Kodak.

302. Kodak is not required to answer the allegations in paragraph 302 of the Complaint because they are directed to defendants other than Kodak.

303. Kodak denies that it has engaged in any “infringing conduct” or that Parallel Networks is entitled to any damages. Insofar as the allegations in paragraph 303 of the Complaint relate to contributory or induced infringement, Kodak is not required to respond because it has filed concurrently herewith a Motion to Dismiss Parallel’s claims of contributory and induced infringement. Kodak is not required to answer the allegations in paragraph 303 of the Complaint insofar as they are directed to other defendants.

304. Kodak denies each of the allegations in paragraph 304 of the Complaint insofar as they pertain to Kodak. Kodak is not required to answer the allegations in paragraph 304 of the

Complaint insofar as they purport to set forth legal conclusions or are directed to other defendants.

COUNT II: WILLFUL INFRINGEMENT

305. Kodak is not required to respond to Parallel's allegation in paragraph 305 of the Complaint that Eastman Kodak Company and Kodak Imaging Network, Inc. have willfully infringed the '111 patent because it has filed concurrently herewith a Motion to Dismiss Parallel's claim of willful infringement. Kodak is not required to answer the remaining allegations in paragraph 305 of the Complaint insofar as they purport to set forth legal conclusions or are directed to other defendants.

DEFENSES

FIRST AFFIRMATIVE DEFENSE

Kodak has not infringed and does not infringe any valid claim of the '111 patent, either literally or under the doctrine of equivalents

SECOND AFFIRMATIVE DEFENSE

One or more claims of the '111 patent is invalid and/or unenforceable for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, 112, and/or 116.

THIRD AFFIRMATIVE DEFENSE

Parallel's claim for injunctive relief is barred because Parallel does not practice the '111 patent.

FOURTH AFFIRMATIVE DEFENSE

The '111 patent is unenforceable against Kodak because of estoppel, laches, waiver, or other applicable equitable doctrines.

FIFTH AFFIRMATIVE DEFENSE

The relief sought by Parallel is limited by 35 U.S.C. § 286, which prohibits recovery for any alleged infringement committed more than six years before the filing of the Complaint.

SIXTH AFFIRMATIVE DEFENSE

Kodak reserves all affirmative defenses under Rule 8(c) of the Federal Rules of Civil Procedure, the patent laws of the United States, and any other defenses at law or in equity that may now exist or in the future be available based on discovery and further factual investigation in this case.

SEVENTH AFFIRMATIVE DEFENSE

Kodak reserves the right to assert additional affirmative defenses after the Court resolves its Motion to Dismiss, including, for example, counterclaims of no contributory infringement, no induced infringement, and no willful infringement, if the Court does not grant Kodak's Motion to Dismiss.

DEMAND FOR JURY TRIAL

Kodak requests a jury trial, pursuant to Federal Rule of Civil Procedure 38(b), of any issues that may be tried to a jury.

Dated: November 22, 2010

EASTMAN KODAK COMPANY and
KODAK IMAGING NETWORK, INC.,

By their attorneys,

/s/ David J. Beck

David J. Beck
State Bar No. 00000070
BECK REDDEN & SECREST
1221 McKinney St, Suite 4500
One Houston Center
Houston, TX 77010-2010
Telephone: (713) 951-3700
Fax: (713) 951-3720
Email: dbeck@brsfirm.com

Of Counsel:

Michael E. Richardson
State Bar No. 24002838
BECK REDDEN & SECREST
1221 McKinney St, Suite 4500
One Houston Center
Houston, TX 77010-2010
Telephone: (713) 951-3700
Fax: (713) 951-3720
Email: mrichardson@brsfirm.com

Michael J. Summersgill (*pro hac vice* application pending)
WILMER, CUTLER PICKERING HALE & DORR
60 State Street
Boston, MA 02109
Telephone: (617) 526-6000
Fax: (617) 526-5000
Email: michael.summersgill@wilmerhale.com

CERTIFICATE OF SERVICE

I, Michael E. Richardson, hereby certify that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service pursuant to Local Rule CV-5(a)(3)(A) through the Court's CM/ECF system. Any other counsel of record will be served by first class mail on this date.

Dated: November 22, 2010

/s/ Michael E. Richardson
Michael E. Richardson