

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

<p>PARALLEL NETWORKS, LLC,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>ADIDAS AMERICA, INC. <i>et al.</i></p> <p style="text-align: center;">Defendants.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Case No. 6:10-cv-00491-LED</p> <p>JURY TRIAL DEMANDED</p>
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**NAVISTAR’S ANSWER TO
PARALLEL NETWORK’S COMPLAINT**

Defendant Navistar, Inc. ("Navistar") responds to the Original Complaint ("Complaint") of Parallel Networks, LLC ("Parallel Networks") as follows:

I. THE PARTIES

1. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1 of the Complaint, and accordingly, denies the same.

2. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 2 of the Complaint, and accordingly, denies the same.

3. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 3 of the Complaint, and according, denies the same.

4. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 4 of the Complaint, and according, denies the same.

5. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of the Complaint, and according, denies the same.

6. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 6 of the Complaint, and according, denies the same.

7. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 7 of the Complaint, and according, denies the same.

8. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 8 of the Complaint, and according, denies the same.

9. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 9 of the Complaint, and according, denies the same.

10. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of the Complaint, and according, denies the same.

11. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 11 of the Complaint, and according, denies the same.

12. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 12 of the Complaint, and according, denies the same.

13. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 13 of the Complaint, and according, denies the same.

14. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 14 of the Complaint, and according, denies the same.

15. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 15 of the Complaint, and according, denies the same.

16. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 16 of the Complaint, and according, denies the same.

17. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 17 of the Complaint, and according, denies the same.

18. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 18 of the Complaint, and according, denies the same.

19. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 19 of the Complaint, and according, denies the same.

20. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 20 of the Complaint, and according, denies the same.

21. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 21 of the Complaint, and according, denies the same.

22. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 22 of the Complaint, and according, denies the same.

23. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 23 of the Complaint, and according, denies the same.

24. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 24 of the Complaint, and according, denies the same.

25. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 25 of the Complaint, and according, denies the same.

26. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 26 of the Complaint, and according, denies the same.

27. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 27 of the Complaint, and according, denies the same.

28. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 28 of the Complaint, and according, denies the same.

29. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 29 of the Complaint, and according, denies the same.

30. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 30 of the Complaint, and according, denies the same.

31. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 31 of the Complaint, and according, denies the same.

32. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 32 of the Complaint, and according, denies the same.

33. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 33 of the Complaint, and according, denies the same.

34. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 34 of the Complaint, and according, denies the same.

35. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 35 of the Complaint, and according, denies the same.

36. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 36 of the Complaint, and according, denies the same.

37. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 37 of the Complaint, and according, denies the same.

38. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 38 of the Complaint, and according, denies the same.

39. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 39 of the Complaint, and according, denies the same.

40. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 40 of the Complaint, and according, denies the same.

41. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 41 of the Complaint, and according, denies the same.

42. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 42 of the Complaint, and according, denies the same.

43. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 43 of the Complaint, and according, denies the same.

44. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 44 of the Complaint, and according, denies the same.

45. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 45 of the Complaint, and according, denies the same.

46. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 46 of the Complaint, and according, denies the same.

47. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 47 of the Complaint, and according, denies the same.

48. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 48 of the Complaint, and according, denies the same.

49. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 49 of the Complaint, and according, denies the same.

50. Admitted.

51. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 51 of the Complaint, and according, denies the same.

52. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 52 of the Complaint, and according, denies the same.

53. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 53 of the Complaint, and according, denies the same.

54. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 54 of the Complaint, and according, denies the same.

55. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 55 of the Complaint, and according, denies the same.

56. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 56 of the Complaint, and according, denies the same.

57. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 57 of the Complaint, and according, denies the same.

58. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 58 of the Complaint, and according, denies the same.

59. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 59 of the Complaint, and according, denies the same.

60. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 60 of the Complaint, and according, denies the same.

61. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 61 of the Complaint, and according, denies the same.

II. JURISDICTION AND VENUE

62. Navistar admits that the Complaint purports to be an action for alleged infringement of United States patents, but denies that any bases exist for the action and denies it

has committed any act that would give rise to any cause of action asserted in the Complaint. Navistar admits that this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a) to adjudicate actions arising under the patent laws of the United States. Solely with respect to Navistar and for the purpose of this action, and without waiving any defense of lack of personal jurisdiction or challenge to venue in connection with any other cause of action or claim, Navistar does not contest the Court's personal jurisdiction over Navistar or the appropriateness of venue in this action. Navistar denies that it has committed any act within the State of Texas or elsewhere that would give rise to any cause of action asserted in the Complaint. Navistar denies that it makes, uses, or sells any infringing products within the Eastern District of Texas or elsewhere. As to the other defendants, Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 62 of the Complaint and, accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 62 of the Complaint.

63. Solely with respect to Navistar and for the purpose of this action, and without waiving any defense of lack of venue or improper venue in connection with any other cause of action or claim, Navistar does not contest whether venue properly lies in this district. As to the other defendants, Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 63 of the Complaint and, accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 63 of the Complaint.

COUNT I
ALLEGED INFRINGEMENT OF U.S. PATENT NO. 6,446,111

64. Navistar admits that U.S. Patent No. 6,446,111 ("the '111 patent") is titled "Method and Apparatus for Client-Server Communication Using a Limited Capability Client Over a Low-Speed Communications Link." Navistar admits that the '111 patent was issued on

September 3, 2002, but denies that the '111 patent was duly and legally issued. Navistar further denies that the '111 patent is valid or enforceable. Except as expressly admitted, Navistar denies the allegations in paragraph 64 of the Complaint.

65. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 65, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 65 of the Complaint.

66. Navistar denies Parallel Networks' characterization of the '111 patent. Except as expressly admitted, Navistar denies the allegations in paragraph 66 of the Complaint.

67. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 67 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 67 of the Complaint.

68. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 68 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 68 of the Complaint.

69. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 69 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 69 of the Complaint.

70. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 70 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 70 of the Complaint.

71. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 71 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 71 of the Complaint.

72. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 72 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 72 of the Complaint.

73. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 73 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 73 of the Complaint.

74. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 74 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 74 of the Complaint.

75. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 75 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 75 of the Complaint.

76. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 76 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 76 of the Complaint.

77. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 77 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 77 of the Complaint.

78. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 78 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 78 of the Complaint.

79. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 79 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 79 of the Complaint.

80. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 80 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 80 of the Complaint.

81. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 81 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 81 of the Complaint.

82. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 82 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 82 of the Complaint.

83. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 83 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 83 of the Complaint.

84. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 84 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 84 of the Complaint.

85. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 85 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 85 of the Complaint.

86. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 86 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 86 of the Complaint.

87. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 87 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 87 of the Complaint.

88. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 88 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 88 of the Complaint.

89. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 89 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 89 of the Complaint.

90. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 90 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 90 of the Complaint.

91. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 91 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 91 of the Complaint.

92. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 92 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 92 of the Complaint.

93. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 93 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 93 of the Complaint.

94. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 94 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 94 of the Complaint.

95. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 95 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 95 of the Complaint.

96. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 96 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 96 of the Complaint.

97. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 97 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 97 of the Complaint.

98. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 98 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 98 of the Complaint.

99. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 99 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 99 of the Complaint.

100. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 100 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 100 of the Complaint.

101. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 101 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 101 of the Complaint.

102. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 102 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 102 of the Complaint.

103. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 103 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 103 of the Complaint.

104. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 104 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 104 of the Complaint.

105. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 105 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 105 of the Complaint.

106. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 106 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 106 of the Complaint.

107. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 107 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 107 of the Complaint.

108. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 108 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 108 of the Complaint.

109. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 109 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 109 of the Complaint.

110. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 110 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 110 of the Complaint.

111. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 111 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 111 of the Complaint.

112. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 112 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 112 of the Complaint.

113. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 113 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 113 of the Complaint.

114. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 114 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 114 of the Complaint.

115. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 115 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 115 of the Complaint.

116. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 116 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 116 of the Complaint.

117. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 117 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 117 of the Complaint.

118. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 118 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 118 of the Complaint.

119. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 119 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 119 of the Complaint.

120. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 120 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 120 of the Complaint.

121. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 121 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 121 of the Complaint.

122. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 122 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 122 of the Complaint.

123. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 123 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 123 of the Complaint.

124. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 124 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 124 of the Complaint.

125. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 125 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 125 of the Complaint.

126. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 126 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 126 of the Complaint.

127. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 127 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 127 of the Complaint.

128. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 128 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 128 of the Complaint.

129. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 129 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 129 of the Complaint.

130. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 130 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 130 of the Complaint.

131. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 131 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 131 of the Complaint.

132. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 132 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 132 of the Complaint.

133. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 133 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 133 of the Complaint.

134. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 134 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 134 of the Complaint.

135. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 135 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 135 of the Complaint.

136. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 136 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 136 of the Complaint.

137. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 137 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 137 of the Complaint.

138. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 138 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 138 of the Complaint.

139. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 139 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 139 of the Complaint.

140. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 140 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 140 of the Complaint.

141. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 141 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 141 of the Complaint.

142. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 142 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 142 of the Complaint.

143. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 143 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 143 of the Complaint.

144. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 144 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 144 of the Complaint.

145. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 145 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 145 of the Complaint.

146. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 146 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 146 of the Complaint.

147. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 147 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 147 of the Complaint.

148. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 148 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 148 of the Complaint.

149. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 149 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 149 of the Complaint.

150. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 150 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 150 of the Complaint.

151. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 151 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 151 of the Complaint.

152. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 152 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 152 of the Complaint.

153. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 153 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 153 of the Complaint.

154. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 154 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 154 of the Complaint.

155. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 155 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 155 of the Complaint.

156. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 156 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 156 of the Complaint.

157. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 157 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 157 of the Complaint.

158. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 158 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 158 of the Complaint.

159. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 159 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 159 of the Complaint.

160. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 160 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 160 of the Complaint.

161. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 161 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 161 of the Complaint.

162. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 162 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 162 of the Complaint.

163. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 163 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 163 of the Complaint.

164. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 164 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 164 of the Complaint.

165. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 165 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 165 of the Complaint.

166. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 166 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 166 of the Complaint.

167. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 167 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 167 of the Complaint.

168. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 168 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 168 of the Complaint.

169. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 169 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 169 of the Complaint.

170. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 170 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 170 of the Complaint.

171. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 171 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 171 of the Complaint.

172. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 172 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 172 of the Complaint.

173. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 173 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 173 of the Complaint.

174. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 174 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 174 of the Complaint.

175. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 175 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 175 of the Complaint.

176. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 176 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 176 of the Complaint.

177. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 177 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 177 of the Complaint.

178. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 178 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 178 of the Complaint.

179. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 179 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 179 of the Complaint.

180. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 180 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 180 of the Complaint.

181. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 181 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 181 of the Complaint.

182. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 182 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 182 of the Complaint.

183. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 183 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 183 of the Complaint.

184. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 184 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 184 of the Complaint.

185. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 185 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 185 of the Complaint.

186. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 186 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 186 of the Complaint.

187. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 187 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 187 of the Complaint.

188. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 188 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 188 of the Complaint.

189. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 189 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 189 of the Complaint.

190. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 190 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 190 of the Complaint.

191. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 191 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 191 of the Complaint.

192. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 192 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 192 of the Complaint.

193. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 193 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 193 of the Complaint.

194. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 194 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 194 of the Complaint.

195. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 195 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 195 of the Complaint.

196. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 196 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 196 of the Complaint.

197. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 197 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 197 of the Complaint.

198. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 198 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 198 of the Complaint.

199. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 199 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 199 of the Complaint.

200. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 200 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 200 of the Complaint.

201. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 201 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 201 of the Complaint.

202. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 202 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 202 of the Complaint.

203. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 203 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 203 of the Complaint.

204. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 204 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 204 of the Complaint.

205. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 205 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 205 of the Complaint.

206. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 206 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 206 of the Complaint.

207. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 207 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 207 of the Complaint.

208. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 208 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 208 of the Complaint.

209. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 209 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 209 of the Complaint.

210. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 210 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 210 of the Complaint.

211. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 211 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 211 of the Complaint.

212. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 212 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 212 of the Complaint.

213. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 213 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 213 of the Complaint.

214. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 214 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 214 of the Complaint.

215. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 215 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 215 of the Complaint.

216. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 216 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 216 of the Complaint.

217. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 217 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 217 of the Complaint.

218. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 218 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 218 of the Complaint.

219. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 219 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 219 of the Complaint.

220. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 220 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 220 of the Complaint.

221. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 221 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 221 of the Complaint.

222. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 222 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 222 of the Complaint.

223. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 223 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 223 of the Complaint.

224. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 224 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 224 of the Complaint.

225. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 225 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 225 of the Complaint.

226. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 226 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 226 of the Complaint.

227. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 227 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 227 of the Complaint.

228. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 228 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 228 of the Complaint.

229. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 229 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 229 of the Complaint.

230. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 230 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 230 of the Complaint.

231. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 231 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 231 of the Complaint.

232. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 232 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 232 of the Complaint.

233. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 233 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 233 of the Complaint.

234. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 234 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 234 of the Complaint.

235. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 235 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 235 of the Complaint.

236. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 236 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 236 of the Complaint.

237. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 237 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 237 of the Complaint.

238. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 238 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 238 of the Complaint.

239. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 239 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 239 of the Complaint.

240. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 240 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 240 of the Complaint.

241. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 241 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 241 of the Complaint.

242. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 242 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 242 of the Complaint.

243. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 243 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 243 of the Complaint.

244. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 244 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 244 of the Complaint.

245. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 245 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 245 of the Complaint.

246. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 246 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 246 of the Complaint.

247. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 247 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 247 of the Complaint.

248. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 248 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 248 of the Complaint.

249. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 249 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 249 of the Complaint.

250. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 250 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 250 of the Complaint.

251. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 251 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 251 of the Complaint.

252. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 252 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 252 of the Complaint.

253. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 253 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 253 of the Complaint.

254. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 254 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 254 of the Complaint.

255. Denied.

256. Denied.

257. Denied.

258. Denied.

259. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 259 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 259 of the Complaint.

260. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 260 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 260 of the Complaint.

261. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 261 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 261 of the Complaint.

262. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 262 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 262 of the Complaint.

263. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 263 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 263 of the Complaint.

264. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 264 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 264 of the Complaint.

265. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 265 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 265 of the Complaint.

266. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 266 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 266 of the Complaint.

267. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 267 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 267 of the Complaint.

268. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 268 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 268 of the Complaint.

269. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 269 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 269 of the Complaint.

270. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 270 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 270 of the Complaint.

271. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 271 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 271 of the Complaint.

272. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 272 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 272 of the Complaint.

273. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 273 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 273 of the Complaint.

274. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 274 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 274 of the Complaint.

275. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 275 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 275 of the Complaint.

276. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 276 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 276 of the Complaint.

277. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 277 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 277 of the Complaint.

278. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 278 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 278 of the Complaint.

279. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 279 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 279 of the Complaint.

280. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 280 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 280 of the Complaint.

281. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 281 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 281 of the Complaint.

282. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 282 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 282 of the Complaint.

283. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 283 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 283 of the Complaint.

284. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 284 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 284 of the Complaint.

285. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 285 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 285 of the Complaint.

286. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 286 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 286 of the Complaint.

287. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 287 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 287 of the Complaint.

288. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 288 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 288 of the Complaint.

289. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 289 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 289 of the Complaint.

290. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 290 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 290 of the Complaint.

291. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 291 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 291 of the Complaint.

292. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 292 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 292 of the Complaint.

293. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 293 of the Complaint, and accordingly, denies the

same. Except as expressly admitted, Navistar denies the allegations in paragraph 293 of the Complaint.

294. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 294 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 294 of the Complaint.

295. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 295 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 295 of the Complaint.

296. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 296 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 296 of the Complaint.

297. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 297 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 297 of the Complaint.

298. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 298 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 298 of the Complaint.

299. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 299 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 299 of the Complaint.

300. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 300 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 300 of the Complaint.

301. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 301 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 301 of the Complaint.

302. Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 302 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 302 of the Complaint.

303. As to itself, Navistar denies the allegations contained in paragraph 303 of the Complaint. As to the other defendants, Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 303 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 303 of the Complaint.

304. Denied.

COUNT II
ALLEGED WILLFUL INFRINGEMENT

305. As to itself, Navistar denies the allegations contained in paragraph 305 of the Complaint. As to the other defendants, Navistar is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 305 of the Complaint, and accordingly, denies the same. Except as expressly admitted, Navistar denies the allegations in paragraph 305 of the Complaint.

PRAYER FOR RELIEF

As to itself, Navistar denies that Parallel Networks is entitled to any relief whatsoever, either as prayed for in its complaint or otherwise. As to the other defendants, Navistar is without knowledge or information sufficient to form a belief as to the bases for the prayed-for relief, and accordingly, denies the same.

JURY DEMAND

No response is necessary to Parallel Networks' Jury Demand, however to the extent a response is necessary, Navistar admits that Parallel Networks requests a trial by jury. Pursuant to Fed. R. Civ. P. 38, Navistar hereby respectfully requests a jury trial on all issues and claims so triable.

GENERAL DENIAL

Navistar denies all allegations not expressly admitted.

AFFIRMATIVE DEFENSES

First Defense: Failure To State A Claim

The Original Complaint fails to state a claim upon which relief can be granted against Navistar.

Second Defense: Non-Infringement

Navistar has not infringed and does not infringe, directly or indirectly, willfully or otherwise, any valid claim or claims of the Patents-in-Suit.

Third Defense: Invalidity

One or more claims of the '111 patent are invalid for failure to meet one or more of the conditions of patentability specified in 35 U.S.C. §§ 101 *et seq.*, including but not limited to 35 U.S.C. §§ 101, 102, 103, and/or 112.

Fourth Defense: Prosecution History Estoppel

Parallel Networks is precluded under the doctrine of prosecution history estoppel from asserting any construction of any of the claims, whether under the doctrine of equivalents or otherwise, of the '111 patent to cover any product or activity of Navistar.

Fifth Defense: Laches, Waiver, and Estoppel

The '111 patent is unenforceable under the doctrines of laches, waiver, and/or estoppel.

Sixth Defense: Statutory Limitations On Damages And Costs

Parallel Networks' claims for patent infringement damages, if any, are statutorily limited by 35 U.S.C. §§ 286, 287, and/or 288.

Seventh Defense: Unavailability of Injunctive Relief

Claims by Parallel Networks for injunctive relief are barred as a matter of law because Parallel Networks has an adequate remedy at law for any claims included in the Complaint on which Parallel Networks may ultimately prevail.

Eighth Defense: Unclean Hands

On information and belief, Parallel Networks or previous assignees have rendered the '111 patent unenforceable under the doctrine of unclean hands.

WHEREFORE, Navistar respectfully requests that this Court:

- A. Dismiss Parallel Networks's Complaint for Patent Infringement with prejudice;
- B. Enter judgment in Navistar's favor on all counts;
- C. Declare this case exceptional under 35 U.S.C. § 285 and award Navistar its reasonable attorneys' fees, expenses, and costs incurred in this action; and
- D. Award Navistar such other and further relief as this Court deems just and proper.

Dated: November 24, 2010

Respectfully submitted,

/s/ Paul R. Steadman

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Attorneys for Navistar, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been served upon counsel of record through the Court's CM/ECF system on this 24th day of November, 2010.

/s/ Paul R. Steadman