

TRADEMARK HOLDINGS, LLC; §
NAUTICA APPAREL, INC.; §
NAUTICA §
RETAIL USA, INC.; §
NAVISTAR, INC.; §
NEW BALANCE ATHLETIC SHOW, 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 §
IN.; §
and WOMEN'S APPAREL GROUP, §
LLC d/b/a BOSTON APPAREL GROUP, §
LLC, §

Defendants. §

**ANSWER OF DEFENDANTS AMERICAN GIRL, LLC, AND MATTEL, INC., IN
 RESPONSE TO PARALLEL NETWORKS, LLC'S ORIGINAL COMPLAINT FOR
PATENT INFRINGEMENT**

Defendants American Girl, LLC, and Mattel, Inc. (collectively, the "Mattel Entities"), answer Plaintiff Parallel Networks LLC's ("Parallel Networks") Original Complaint for Patent Infringement ("Complaint") as follows:

PARTIES

1. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1.
2. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 2.
3. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 3.
4. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 4.
5. The Mattel Entities deny the allegations in paragraph 5.

6. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 6.

7. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 7.

8. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 8.

9. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 9.

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40. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 40.

41. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 41.

42. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 42.

43. The Mattel Entities admit the allegations in paragraph 43.

44. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 44.

45. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 45.

46. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 46.

47. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 47.

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58. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 58.

59. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 59.

60. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 60.

61. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 61.

JURISDICTION

62. With respect to the allegations set forth in paragraph 62, the Mattel Entities admit that this Court has subject matter jurisdiction over Parallel Networks' claims. The Mattel Entities admit that this Court has personal jurisdiction over them in this particular action. However, the Mattel Entities deny that they have committed acts in this jurisdiction that give rise to any cause of action by Parallel Networks and deny the remaining allegations in paragraph 62, as they relate to the Mattel Entities. To the extent the allegations in paragraph 62 are directed to other entities, the Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of such allegations.

63. With respect to the allegations set forth in paragraph 63, the Mattel Entities admit that venue is proper in this judicial district, but deny that this district is a convenient or appropriate forum in which to proceed with this dispute. The Mattel Entities expressly reserve their rights under 28 U.S.C. § 1404. The Mattel Entities admit that this Court has personal jurisdiction over them in this particular action. However, the Mattel Entities deny that they have committed acts in this jurisdiction that give rise to any cause of action by Parallel Networks and deny the remaining allegations in paragraph 63, as they relate to the Mattel Entities. To the extent the allegations in paragraph 63 are directed to other entities, the Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of such allegations.

COUNT I

64. The Mattel Entities admit the allegations in paragraph 64.

65. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 65.

66. With respect to the allegations set forth in paragraph 66, the Mattel Entities state that the claims of the '111 patent speak for themselves, and no responsive pleading is required.

To the extent that a responsive pleading is required, the Mattel Entities admit that paragraph 66 seems to reflect an effort to paraphrase the limitations of claim 1 of the '111 patent, but deny that the patent "covers" such "systems and methods," as Parallel Networks has failed to include all of the required limitations recited in claim 1.

67. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 67.

68. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 68.

69. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 69.

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79. The Mattel Entities deny the allegations in paragraph 79.

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82. The Mattel Entities deny the allegations in paragraph 82.

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253. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 253.

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299. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 299.

300. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 300.

301. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 301.

302. The Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 302.

303. The Mattel Entities deny the allegations in paragraph 303, as they relate to the Mattel Entities. To the extent the allegations in paragraph 303 are directed to other entities, the Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of such allegations.

304. The allegations in paragraph 304 relating to constructive notice are legal conclusions to which no responsive pleading is required; to the extent a response is required, the Mattel Entities deny the allegations, as they relate to constructive notice of the Mattel Entities. To the extent the allegations in paragraph 304 concerning constructive notice are directed to other entities, the Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of such allegations. The Mattel Entities are without knowledge sufficient to form a belief as to the truth of the allegations regarding marking requirements.

COUNT II

305. The Mattel Entities deny the allegations in paragraph 305, as they relate to the Mattel Entities. To the extent the allegations in paragraph 305 are directed to other entities, the Mattel Entities are without knowledge or information sufficient to form a belief as to the truth of such allegations.

PRAYER FOR RELIEF

These paragraphs set forth the statement of relief requested by Parallel Networks to which no response is required. The Mattel Entities deny that Parallel Networks is entitled to any of the requested relief and deny any allegations.

DEMAND FOR JURY TRIAL

This paragraph sets forth Parallel Networks' request for a jury trial and all issues triable of right before a jury to which no response is required.

AFFIRMATIVE DEFENSES

Subject to the responses above, the Mattel Entities allege and assert the following defenses in response to the allegations, undertaking the burden of proof only as to those defenses deemed affirmative defenses by law, regardless of how such defenses are denominated herein. In addition to the affirmative defenses described below, subject to their responses above, the Mattel Entities specifically reserve all rights to allege additional affirmative defenses that become known through the course of discovery.

306. The claims of the '111 patent are invalid and/or unpatentable for failure to satisfy one or more of the requirements of §§ 101, 102, 103, 112, 132, 251 of Title 35 of the United States Code.

307. Parallel Networks' claims are barred, in whole or in part, by the doctrine of laches.

308. Parallel Networks' request for relief is barred or otherwise limited by 35 U.S.C. § 288.

309. Parallel Networks cannot satisfy the requirements applicable to its request for injunctive relief and has an adequate remedy at law.

310. Parallel Networks' alleged damages are limited because it has not satisfied the requirements for obtaining damages under 35 U.S.C. § 287, and the limitations period further bars past damages claims.

311. The Mattel Entities reserve 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, which may now exist or in the future may be available based on discovery and further factual investigation in this case.

WHEREFORE, the Mattel Entities respectfully request that this Court find against Parallel Networks on all claims against the Mattel Entities and award the Mattel Entities such other and further relief as this Court may deem just and proper.

Dated: November 29, 2010

Respectfully submitted,

By: /s/ C. Erik Hawes

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INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing via the Court's CM/ECF system per Local Rule CV-5(a)(3) .

Dated: November 29, 2010

By: /s/ C. Erik Hawes
C. Erik Hawes