

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

Parallel Networks, LLC,

Plaintiff,

v.

Adidas America, Inc. et al.

Defendants

No. 6:10-cv-00491-LED

Jury Trial Demanded

**PLAINTIFF’S ANSWER TO THE COUNTERCLAIMS OF BBY SOLUTIONS, INC.  
AND BESTBUY.COM, LLC**

Plaintiff Parallel Networks, LLC (“Parallel Networks”) hereby Answers the Counterclaims [Dkt. No. 279] of Defendants BBY Solutions, Inc. and BestBuy.com, LLC (collectively “BestBuy”), by corresponding paragraph number as follows:

**ANSWER TO COUNTERCLAIMS**

**PARTIES**

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.

**JURISDICTION AND VENUE**

- 4. Admitted.
- 5. Admitted.
- 6. Admitted.
- 7. Admitted.

**CAUSES OF ACTION**

8. Admits that this is an action for a declaratory judgment, but denies that Best Buy is entitled to such relief, or any further relief.

9. Admitted.

**FIRST COUNTERCLAIM  
(Declaratory Judgment of Non-Infringement of the ‘111 patent)**

10. Parallel Networks incorporates by reference its statements in and responses to the preceding paragraphs 1-9 as if fully set forth herein.

11. Denied.

12. Denied.

**SECOND COUNTERCLAIM  
(Declaratory Judgment of Invalidity of the ‘111 patent)**

13. Parallel Networks incorporates by reference its statements in and responses to the preceding paragraphs 1-12 as if fully set forth herein.

14. Admitted that Best Buy alleges that the claims of the ‘111 patent are invalid for failure to meet the conditions of patentability and/or otherwise comply with one or more provisions of the patent laws of the United States, but denies such allegations and denies that the claims of the ‘111 patent are invalid for any reason.

15. Denied.

**PRAYER FOR RELIEF**

Parallel Networks denies that Best Buy is entitled to any relief, including that requested in its Prayer for Relief.

**DEMAND FOR A JURY TRIAL**

Best Buy’s Demand for a Jury Trial is an averment to which no responsive pleading is required.

Dated: December 16, 2010

Respectfully submitted,

By: /s/ Charles Craig Tadlock

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ATTORNEYS FOR PLAINTIFF  
PARALLEL NETWORKS, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this 16th day of December, 2010, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ Charles Craig Tadlock

One of the Attorneys for Parallel Networks, LLC