

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 BRIGGS & STRATTON CORPORATION AND BRIGGS & STRATTON POWER PRODUCTS GROUP, LLC**

Plaintiff Parallel Networks, LLC (“Parallel Networks”) hereby Answers the Counterclaims [Dkt. No. 309] of Defendants Briggs & Stratton Corporation and Briggs & Stratton Power Products Group, LLC (collectively “Briggs & Stratton”), by corresponding paragraph number as follows:

**ANSWER TO COUNTERCLAIMS**

**NATURE OF THE LAWSUIT**

Admitted that the counterclaim is an action for a declaration of patent non-infringement, patent invalidity, and unenforceability, but denies that Briggs & Stratton is entitled to such relief, or any further relief.

**THE PARTIES**

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

**JURISDICTION AND VENUE**

4. Admitted.

5. Admitted.

6. Admitted.

**COUNT 1 – INVALIDITY – NON-INFRINGEMENT - UNENFORCEABILITY**

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

8. Admits that Briggs & Stratton seeks a declaration that the products and services made, used, imported, sold or offered for sale by Briggs & Stratton have not and do not infringe, directly or indirectly, any valid and enforceable claim of the '111 patent and/or that the '111 patent is either invalid or otherwise unenforceable, but denies that Briggs & Stratton is entitled to such relief, or any further relief.

9. Denied with respect to Briggs & Stratton, but admitted with respect to Parallel Networks' allegation that this case is exceptional.

**PRAYER FOR RELIEF**

Parallel Networks denies that Briggs & Stratton is entitled to any relief, including that requested in its Prayer for Relief.

**JURY DEMAND**

Briggs & Stratton's Jury Demand 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