

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
CITIZEN WATCH COMPANY OF AMERICA, INC.**

Plaintiff Parallel Networks, LLC (“Parallel Networks”) hereby Answers the Counterclaims [Dkt. No. 272] of Defendant Citizen Watch Company of America, Inc. (“Citizen Watch”), by corresponding paragraph number as follows:

ANSWER TO COUNTERCLAIMS

The Parties

313. Admitted.

314. Admitted.

Jurisdiction

315. Admitted.

316. Admitted.

Count I

Declaratory Relief Regarding Non-Infringement

317. Admitted.

318. Admits that Citizen Watch requests a declaration by the Court that it does not infringe any claim of the '111 Patent under any theory, but denies that Citizen Watch is entitled to such relief, or any further relief.

Count II

Declaratory Relief Regarding Invalidity

319. Admitted.

320. Admits that Citizen Watch requests a declaration by the Court that the claims of the '111 Patent are invalid, but denies that Citizen Watch is entitled to such relief, or any further relief.

Count III

Declaratory Relief Regarding Unenforceability

321. Admitted.

322. Admits that Citizen Watch requests a declaration by the Court that the claims of the '111 Patent are unenforceable, but denies that Citizen Watch is entitled to such relief, or any further relief.

PRAYER

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

JURY DEMAND

Citizen Watch's Jury Demand is an averment to which no responsive pleading is required.

Dated: December 16, 2010

Respectfully submitted,

By: /s/ Charles Craig Tadlock

Charles Craig Tadlock
Texas State Bar No. 00791766
TADLOCK LAW FIRM
400 E. Royal Lane, Suite 290
Irving, Texas 75039
214-785-6014 (phone)
craig@tadlocklawfirm.com

and

315 N. Broadway, Suite 307
Tyler, Texas 75702
903-283-2758 (phone)

George S. Bosy (*pro hac vice*)
David R. Bennett (*pro hac vice*)
Bosy & Bennett
300 N. La Salle St.
49th Floor
Chicago, IL 60654
Telephone: (312) 803-0437
Email: gbosy@bosybennett.com
dbennett@bosybennett.com

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