

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 HASBRO, INC.

Plaintiff Parallel Networks, LLC (“Parallel Networks”) hereby Answers the Counterclaims [Dkt. No. 257] of Defendant Hasbro, Inc. (“Hasbro”), by corresponding paragraph number as follows:

ANSWER TO COUNTERCLAIMS

INTRODUCTION

320. Admits that through its counterclaims, Hasbro purports to seek a declaration by the Court that it does not infringe the patent-in-suit and that the patent-in-suit is invalid, but denies that Hasbro is entitled to such relief, or any further relief. Parallel Networks denies the remaining allegations of paragraph 320 of Defendant’s Counterclaims.

PARTIES

321. Admitted.

322. Admitted.

JURISDICTION

323. Admitted.

THE PATENT

324. Admitted.

EXISTENCE OF AN ACTUAL CONTROVERSY

325. Admitted.

326. Admitted.

327. Admitted.

328. Parallel Networks lacks sufficient knowledge to admit or deny the allegation and therefore denies the allegation.

FIRST COUNTERCLAIM

[Declaration of Non-Infringement of the '739 [*sic*, '111] patent]

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

330. Admitted.

331. Admitted.

332. Admits that Hasbro requests a judicial declaration that it neither has infringed, nor is infringing, the patent-in-suit, but denies that Hasbro is entitled to such relief, or any further relief.

SECOND COUNTERCLAIM

[Declaration of Invalidity of the '739 [*sic*, '111] patent]

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

334. Admitted.

335. Admitted.

336. Admits that Hasbro requests a judicial declaration that the claims of the patent-in-suit are invalid and unenforceable, but denies that Hasbro is entitled to such relief, or any further relief.

PRAYER FOR RELIEF

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

JURY DEMAND

Hasbro, Inc.'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