

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
LG ELECTRONICS USA, INC. ("LGE")**

Plaintiff Parallel Networks, LLC ("Parallel Networks") hereby Answers the Counterclaims [Dkt. No. 331] of Defendant LG Electronics USA, Inc. ("LGE"), by corresponding paragraph number as follows:

ANSWER TO COUNTERCLAIMS

THE PARTIES

1. Admitted.
2. Admitted.

JURISDICTION AND VENUE

3. Admits that LGE filed a claim for Declaratory Judgment which arises from an actual and existing controversy between LGE and Parallel Networks, but denies that LGE is entitled to any relief.

4. Admitted.
5. Admitted.
6. Admitted.

COUNT I—DECLARATORY JUDGMENT OF NON-INFRINGEMENT

7. Parallel Networks incorporates by reference its statements in and responses to the preceding paragraphs 1-6 as if fully set forth herein.

8. Admitted.

9. Admits that LGE requests a declaration by the Court that LGE has not infringed, and does not infringe, any valid claim of the '111 patent, whether directly, indirectly, individually, jointly, contributorily, and/or by inducement, but denies that LGE is entitled to such relief, or any further relief.

COUNT II—DECLARATORY JUDGMENT OF INVALIDITY

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

11. Admitted.

12. Admits that LGE requests a declaration by the Court that each claim of the '111 patent is invalid for failing to satisfy the conditions for patentability specified in 35 U.S.C. § 101 et seq., but denies that LGE is entitled to such relief, or any further relief.

COUNT III—DECLARATORY JUDGMENT OF UNENFORCEABILITY

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.

15. Admits that LGE requests a declaration by the Court that the claims of the '111 patent are unenforceable, but denies that LGE is entitled to such relief, or any further relief.

PRAYER FOR RELIEF

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

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