

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  
MACY'S WEST STORES, INC. AND MACYS.COM, INC.**

Plaintiff Parallel Networks, LLC ("Parallel Networks") hereby Answers the Counterclaims [Dkt. No. 321] of Defendant Macy's West Stores, Inc. and Macys.com, Inc. (collectively "Macy's"), by corresponding paragraph number as follows:

**ANSWER TO COUNTERCLAIMS**

**The Parties**

313. Admitted.

314. Admitted.

315. Admitted.

**Jurisdiction**

316. Admitted.

317. Admitted.

**Count I**

**Declaratory Relief Regarding Non-Infringement**

318. Admitted.

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

**Count II**

**Declaratory Relief Regarding Invalidity**

320. Admitted.

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

**Count III**

**Declaratory Relief Regarding Unenforceability**

322. Admitted.

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

**PRAYER**

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

**JURY DEMAND**

Macy'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, 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