

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
MOTOROLA, INC. AND MOTOROLA TRADEMARK HOLDINGS, LLC**

Plaintiff Parallel Networks, LLC (“Parallel Networks”) hereby Answers the Counterclaims [Dkt. No. 301] of Defendant Motorola, Inc., and Motorola Trademark Holdings, LLC (collectively “Motorola”), by corresponding paragraph number as follows:

ANSWER TO COUNTERCLAIMS

The Parties

1. Admitted.
2. Admitted.

Jurisdiction and Venue

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

Existence of Justiciable Controversy

7. Admitted.
8. Admitted.

9. Admitted.

10. Admitted.

First Claim for Relief
(Declaratory Judgment of Non-Infringement of the '111 Patent)

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

12. Denied.

Second Claim for Relief
(Declaratory Judgment of Invalidity of the '111 Patent)

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

14. Denied.

Demand for Jury Trial

Motorola's Demand for Jury Trial is an averment to which no responsive pleading is required.

Prayer for Relief

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

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