

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
NISSAN NORTH AMERICA, INC.**

Plaintiff Parallel Networks, LLC ("Parallel Networks") hereby Answers the Counterclaims [Dkt. No. 296] of Defendant Nissan North America, Inc. ("Nissan"), by corresponding paragraph number as follows:

ANSWER TO COUNTERCLAIMS

The Parties

1. Admitted.
2. Admitted.

Jurisdiction and Venue

3. Admitted.
4. Admitted.

Controversy

5. Admitted.
6. Admitted.
7. Admitted.
8. Denied.

Count I

(Declaratory Judgment of Non-Infringement of the '111 Patent)

9. Parallel Networks incorporates by reference its statements in and responses to the preceding paragraphs 1-8 as if fully set forth herein.

10. Admits that Nissan requests a declaration by the Court that it does not infringe and has not infringed any claim of the '111 patent, but denies that Nissan is entitled to such relief, or any further relief.

Count II

(Declaratory Judgment of Invalidity 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.

Nissan's Prayer for Relief

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

Jury Demand

Nissan'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, 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