

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
AMERICAN SUZUKI MOTOR CORPORATION**

Plaintiff Parallel Networks, LLC ("Parallel Networks") hereby Answers the Counterclaims [Dkt. No. 328] of Defendant American Suzuki Motor Corporation ("Suzuki"), by corresponding paragraph number as follows:

ANSWER TO COUNTERCLAIMS

PARTIES

1. Admitted.
2. Admitted.

JURISDICTION AND VENUE

3. Admits that Suzuki filed an action for declaratory relief, but denies that Suzuki is entitled to any relief.

4. Admitted.

5. Admitted.

6. Admits that Suzuki denies Parallel Networks' claim of infringement of the '111 patent, but denies that Suzuki does not infringe.

7. Admitted.

COUNTERCLAIM ONE

(Declaratory Judgment of Noninfringement of the '111 Patent)

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

9. Admitted.

10. Admits that Parallel Networks makes such a statement in paragraph 83 of the Complaint, but denies that the quotation is the complete assertion in paragraph 83.

11. Admits that Suzuki denies Parallel Networks' claims of infringement and believes that the Complaint has been filed without good cause, but denies such assertions. All remaining allegations in the paragraph are denied.

12. Admitted.

13. Denied.

COUNTERCLAIM TWO

(Declaratory Judgment of Invalidity of the '111 patent)

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

15. Admits that Suzuki denies that the '111 patent is valid and asserts that the '111 patent is invalid for failure to comply with the requirements of 35 U.S.C. § 101 et seq., but denies such assertions. All remaining allegations in the paragraph are denied.

16. Admitted.

17. Denied.

PRAYER

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

DEMAND FOR A JURY TRIAL

Suzuki's Demand for a Jury Trial 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