

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  
VICTORIA’S SECRET DIRECT BRAND MANAGEMENT, LLC**

Plaintiff Parallel Networks, LLC (“Parallel Networks”) hereby Answers the Counterclaims [Dkt. No. 356] of Defendant Victoria’s Secret Direct Brand Management, LLC (“VSDBM”), by corresponding paragraph number as follows:

**ANSWER TO COUNTERCLAIMS**

**Parties**

1. Admitted.
2. Admitted.

**Jurisdiction**

3. Admit that this is an action for a Declaratory Judgment of non-infringement and invalidity of the ‘111 patent, but denies the VSDBM is entitled to any relief.

4. Admitted that Parallel Networks is the assignee of all right, title and interest in the ‘111 patent, that Parallel Networks has charged VSDBM with infringement of the ‘111 patent, that VSDBM has denied the charges of infringement and has alleged that the ‘111 patent is invalid, and that there is an actual and justiciable controversy existing between VSDBM and

Parallel Networks. Denied that VSDBM does not infringe, that the patent is invalid, and that VSDBM is entitled to any relief. All other allegation in paragraph 4 are denied.

5. Admitted.

6. Admitted.

7. Admitted.

**FIRST COUNTERCLAIM  
(Declaratory Judgment Of Non-Infringement)**

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

9. Denied.

**SECOND COUNTERCLAIM  
(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. Denied.

**JURY DEMAND**

VSDBM's Jury Demand is an averment to which no responsive pleading is required.

**PRAYER FOR RELIEF**

Parallel Networks denies that VSDBM 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  
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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