

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

PARALLEL NETWORKS, LLC	§	
	§	Case No. 6:10-cv-00491-LED
Plaintiff,	§	
	§	
v.	§	
	§	
ADIDAS AMERICA, INC., ET AL.,	§	
	§	
Defendants.	§	

**CERTAIN DEFENDANTS’ NOTICE OF JOINDER IN JOINT
MOTION BY ALL 6:10-CV-00111 PARTIES TO BIFURCATE DAMAGES ISSUES**

As the Court is aware, there are pending four separate actions in which the plaintiff, Parallel Networks, LLC, has asserted the same patent against more than 120 defendants. At the recent scheduling conference in three of the actions, the Court invited suggestions from the parties for the efficient management of the cases. The undersigned defendants all respectfully submit that bifurcating liability from damages, for both discovery and trial, is the first¹ “global” efficiency measure available to the Court. Consequently, the undersigned Defendants respectfully join the agreed motion for bifurcation filed in *Parallel Networks, LLC v. Abercrombie & Fitch Co. et al.*, No. 6:10-cv-00111 (E.D. Tex. filed March 29, 2010) (Joint Motion by All Parties to Bifurcate Damages Issues, Dkt. No. 307), as though filed in the present matter and extending the same relief to the undersigned Defendants in the present matter, to promote the efficient resolution of this case.

¹ In accordance with the Court’s January 4, 2011 directive, the parties also are exploring additional avenues for enhancing efficiency, and will present these on or before the February 10, 2011 hearing set by the Court.

Dated: January 24, 2011

Respectfully submitted,

FISH & RICHARDSON P.C.

By: /s/ David B. Conrad

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JONES RETAIL CORPORATION;
MACY'S WEST STORES, INC.;
MACYS.COM, INC.;
MITSUBISHI MOTORS NORTH
AMERICA, INC.;
SUBARU OF AMERICA, INC.;
SUNGLASS HUT TRADING, LLC;
WOLVERINE WORLD WIDE,
INC.; AND
WOMEN'S APPAREL GROUP, LLC D/B/A
BOSTON APPAREL GROUP, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on January 24, 2011 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ David B. Conrad

David B. Conrad