

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

PARALLEL NETWORKS, LLC)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 6:10-cv-00491-LED
)	
ADIDAS AMERICA, INC., <i>et al.</i>)	
<i>Defendants.</i>)	

**DEFENDANT VICTORIA’S SECRET DIRECT BRAND MANAGEMENT,
LLC’S NOTICE OF JOINDER IN JOINT MOTION BY ALL
6:10-CV-00111 PARTIES TO BIFURCATE DAMAGES ISSUES**

Pursuant to the Court’s Order dated January 5, 2011 (Dkt. No. 446), Defendant Victoria’s Secret Direct Brand Management, LLC (“Victoria’s Secret”) respectfully seeks to bifurcate the liability issues from the damages issues for the reasons stated in the agreed Joint Motion by All Parties to Bifurcate Damages Issues, filed on March 29, 2010 as Dkt. No. 307 in the co-pending action before this court, *Parallel Networks, LLC v. Abercrombie & Fitch, et al.*, Case No. 6:01-cv-00111. For efficiency, the arguments presented in that Joint Motion, rather than repeated herein, are incorporated by reference in this Notice and provide the basis for Victoria’s Secret’s request for bifurcation.

DATED: January 25, 2011

Respectfully submitted,

/s/ Charles Ainsworth

Charles Ainsworth
State Bar No. 00783521
Email: charley@pbatyler.com
Robert C. Bunt
State Bar No. 00787165
Email: rcbunt@pbatyler.com
Parker, Bunt & Ainsworth, P.C.
100 E. Ferguson, Suite 1114

Tyler, TX 75702
Phone: (903) 531-3535
Fax: (903) 533-9687

John F. Ward
Email: wardj@wardolivo.com
Michael J. Zinna
Email: zinnam@wardolivo.com

WARD & OLIVO
380 Madison Avenue
New York, New York 10017
Phone: (212) 697-6262
Fax: (212) 972-5866

Patrick R. Colsher
Email: colsherp@wardolivo.com

WARD & OLIVO
382 Springfield Avenue
Summit, New Jersey 07901
Phone: (908) 277-3333
Fax: (908) 277-6373

*Attorneys for Defendant Victoria's Secret
Direct Brand Management, LLC*

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on January 25, 2011.

/s/ Charles Ainsworth