

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.

Civil Action No. 6:10-CV-491-LED

**Jury Trial Demanded**

**DEFENDANT AT&T, INC.'S NOTICE OF JOINDER IN 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. Defendant AT&T, Inc. (“AT&T”) respectfully submits that bifurcating liability from damages, for both discovery and trial, is the first<sup>1</sup> “global” efficiency measure available to the Court. Consequently, AT&T respectfully joins 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 AT&T in the present matter, to promote the efficient resolution of this case.

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<sup>1</sup> 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 25, 2011

Respectfully submitted,

*/s/ Chad Ennis*

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***ATTORNEYS FOR DEFENDANT  
AT&T INC.***

**CERTIFICATE OF SERVICE**

I hereby certify that on January 25, 2011, the foregoing document **DEFENDANT AT&T, INC.'S NOTICE OF JOINDER IN MOTION BY ALL 6:10-CV-00111 PARTIES TO BIFURCATE DAMAGES ISSUES** was filed electronically with the Clerk of the Court via the CM/ECF system in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service pursuant to Local Rule CV-5(a)(3)(A).

*/s/ Dawn Crider*

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