

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

Parallel Networks, LLC,

Plaintiff

vs.

NO. 6:10-cv-491-LED

Adidas America, Inc., et al,

Defendants.

**DEFENDANT HAYNEEDLE, INC.'S NOTICE OF JOINDER IN THE JOINT MOTION
BY 6:10 CV 00111 PARTIES TO BIFURCATE THE DAMAGES ISSUES**

Defendant Hayneedle, Inc., (“Hayneedle”) hereby seeks to bifurcate the issue of liability from damages in the above-captioned case 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 entitled *Parallel Networks, LLC v. Abercrombie & Fitch Co., et al.*, Case No. 6:10-cv-00111. The arguments presented in that Joint Motion are incorporated by reference in this notice and provide the basis for Hayneedle’s request for bifurcation.

Accordingly, for the efficient management of this action, Hayneedle respectfully joins the agreed motion for bifurcation (Dkt No. 307) as though filed in the present matter and providing the same relief to Hayneedle in this matter.

Dated: January 26, 2011

Respectfully submitted,

/s/ Gregory P. Love

Gregory P. Love
STEVENS LOVE
109 West Tyler Street
Longview, TX 75601
(903) 753-6760
(903) 753-6761 Fax
greg@stevenslove.com

- and -

John P. Passarelli, Bar No. 16018
James M. Sulentic, Bar No. 19610
Stephen J. Pedersen, Bar No. 22465
KUTAK ROCK LLP
The Omaha Building
1650 Farnam Street
Omaha, NE 68102-2186
(402) 346-6000

ATTORNEYS FOR DEFENDANT
Hayneedle, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who are deemed to have consented to electronic service per Local Rule CV-5(a)(3)(A) on this the 26th day of January 2011.

/s/ Gregory P. Love

Gregory P. Love