

**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-00491-LED

JOINT STATEMENT REGARDING THE DISCOVERY ORDER

Pursuant to the Court's orders in this case, the parties have conferred at length and in good faith and the parties have not been able to reach an agreement on the Discovery Order. The sole disputed issue is with respect to Rule 30(b)(6) depositions. Therefore, two Proposed Discovery Orders are being submitted.

Exhibit A is the Proposed Discovery Order for Plaintiff Parallel Networks.

Exhibit B is the Proposed Discovery Order for Defendants.

The following is a comparison of the terms of the Proposed Discovery Orders.

	Proposal by Plaintiff	Proposal by Defendants
Rule 30(b)(6) dep.	<p>Plaintiff may take a total of 21 hours of Rule 30(b)(6) deposition testimony per Defendant.</p> <p>Defendants may collectively take 14 hours of Rule 30(b)(6) deposition testimony of Plaintiff; and, in addition, each Defendant may take 2 hours of Rule 30(b)(6) testimony of Plaintiff (but if there are less than 4 Defendants</p>	<p>Plaintiff may take a total of 21 hours of Rule 30(b)(6) deposition testimony per Defendant.</p> <p>Defendants may collectively take 14 hours of Rule 30(b)(6) deposition testimony of Plaintiff; and, in addition, each Defendant may take up to five hours of Rule 30(b)(6) testimony of Plaintiff.</p>

	<p>remaining, then the Defendants get no less than 21 hours).</p> <p>Defendants may not collectively exceed 56 hours of Rule 30(b)(6) deposition of Plaintiff.</p> <p>No witness will sit for more than two days per week for a deposition, except by agreement.</p>	<p>No witness will sit for more than two days per week for a deposition, except by agreement.</p>
--	--	---

Dated: February 8, 2011

Respectfully submitted,
 By: /s/ David R. Bennett
 George S. Bosy
 David R. Bennett
 Bosy & Bennett
 300 N. La Salle St.
 49th Floor
 Chicago, IL 60654
 Telephone: (312) 803-0437
 Email: gbosy@bosybennett.com
 dbennett@bosybennett.com

Charles Craig Tadlock
 Texas State Bar No. 00791766
 TADLOCK LAW FIRM
 400 E. Royal Lane, Suite 290
 Irving, Texas 75039
 214-785-6014 (phone)
 craig@tadlocklawfirm.com
 and
 315 N. Broadway, Suite 307
 Tyler, Texas 75702
 903-283-2758 (phone)

ATTORNEYS FOR PLAINTIFF
 PARALLEL NETWORKS, LLC

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Plaintiff and Defendants have conferred, and that this submission is jointly submitted.

/s/ David R. Bennett

One of the Attorneys for 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 8th day of February, 2011, 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/ David R. Bennett

One of the Attorneys for Parallel Networks, LLC