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8 Communication Co. Ltd.

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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12
13 ANCORA TECHNOLOGIES, INC.,
14 Plaintiff,
15 v.
16 TCT MOBILE (US) INC. AND
17 HUIZHOU TCL MOBILE
COMMUNICATION CO. LTD.,
18 Defendants.

Case No. 8:19-CV-02192
**JOINT STIPULATION TO
CONSOLIDATE**
Judge: Hon. Josephine L. Staton
[Proposed Order Submitted Herewith]

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JOINT STIPULATION

Pursuant to Civil Local Rule 7-1, Plaintiff Ancora Technologies, Inc. (“Ancora”) and Defendants TCT Mobile (US) Inc. and Huizhou TCL Mobile Communication Co. Ltd. (“TCL”), by and through their respective counsel of record, hereby stipulate and request that the Court enter an order consolidating this case with co-pending case 2:20-cv-01252. In support of this request, the parties hereby state as follows:

1. Ancora filed a complaint on August 27, 2019 and an amended complaint on September 12, 2019 in the Eastern District of Texas alleging TCL Corp., TCL Communication Ltd., TCL Communication Technology Holdings Ltd., TCT Mobile International Ltd., TCT Mobile, Inc., TCT Mobile (US) Inc., and TCT Mobile (US) Holdings Inc. infringe U.S. Patent No. 6,411,941 (’941 patent). *Ancora Technologies, Inc. v. TCL Corp.*, No. 4:19-cv-00624 (E.D. Tex. Aug. 27, 2019) (“Texas Lawsuit”).
2. On November 12, 2019, TCL commenced the instant action against Ancora for declaratory judgment of noninfringement of the ’941 patent. *Ancora Technologies, Inc. v. TCT Mobile (US) Inc.*, No. 8:19-cv-02192 (C.D. Cal. Nov. 12, 2019).
3. On January 29, 2020, Ancora and TCL stipulated in this action to, *inter alia*, transfer the Texas Lawsuit to this Court for consolidation with this lawsuit. *See* Dkt. No. 22. On February 5, 2020, the Court granted the stipulation. Dkt. No. 23.
4. On February 4, 2020, the parties jointly moved the Texas court to transfer the Texas Lawsuit to this Court on the basis of the parties’ stipulation. *See* Texas Lawsuit, Dkt. No. 26. On February 5, 2020, the Texas court granted the joint motion and transferred the Texas Lawsuit to this Court. *See* Texas Lawsuit, Dkt. No. 27.

1 5. At present, the instant lawsuit and the transferred Texas Lawsuit are both
2 pending before the Court. *See Ancora Technologies, Inc. v. TCL Corp.*, No.
3 2:20-cv-01252 (C.D. Cal.) (“Second California Lawsuit”).

4 6. On the basis of the foregoing, Ancora and TCL request that the Court issue an
5 order consolidating the instant lawsuit (8:19-cv-02192) and the Second
6 California Lawsuit (2:20-cv-01252). The parties are filing a similar stipulation
7 in the Second California Lawsuit simultaneous with this filing.

8 **IT IS SO STIPULATED.**

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11 DATED: February 19, 2020

DATED: February 19, 2020

12 **PERKINS COIE LLP**

BROOKS KUSHMAN P.C.

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21 * Pursuant to Local Rule 5-4.3.4(a)(2), the filing party attests that TCL’s counsel
22 concurs in the content of this stipulation and has authorized its filing with his
23 electronic signature.
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