

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GODO KAISHA IP BRIDGE 1,

Plaintiff,

v.

OMNIVISION TECHNOLOGIES, INC.,

Defendant.

Case No. 1:16-cv-00290-JFB-SRF

**JOINT MOTION TO FILE AMENDED COMPLAINT AND STIPULATION
REGARDING NOTICE**

Pursuant to Fed. R. Civ. P. 15(a)(2) and the Court’s Scheduling Order (Dkt. No. 37), which provides a deadline of January 15, 2018 for motions to amend the pleadings, Plaintiff Godo Kaisha IP Bridge 1 (“IPB”) and Defendant OmniVision Technologies, Inc. (“OmniVision”) request that the Court order that Plaintiff Godo Kaisha IP Bridge 1 (“IPB”) may file an amended complaint removing its allegations of infringement for U.S. Patent Nos. 7,279,727; 7,709,900; and 7,126,174 (the “Dismissed Claims”) within seven days of the Court’s grant of this motion. The amended complaint is attached as Exhibit A. A redline showing changes from the current complaint (Dkt. No. 1) is attached as Exhibit B. The amended complaint removes original Counts IV, VIII, and IX.

Good cause exists for the relief sought herein. Removing three of the ten patents-in-suit will streamline the case and lead to a more efficient use of the Court’s and the parties’ time and resources.

The parties stipulate and agree that the requested amendment is made without prejudice and that the original complaint and litigation of this case do not constitute notice of infringement to OmniVision for U.S. Patent Nos. 7,279,727; 7,709,900; and 7,126,174.

The parties further stipulate that IPB's original filing of the Dismissed Claims shall not be referenced in this action for any purpose, including any request for attorneys' fees or costs based on an allegation that their filing was in any way improper or unsupported by a reasonable pre-suit investigation.

Dated: November 13, 2017

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CERTIFICATE OF SERVICE

The undersigned certifies that the forgoing document was filed through the ECF system on November 13, 2017.

/s/ Stamatios Stamoulis

Stamatios Stamoulis (#4606)

SO ORDERED, this _____ day of _____, 2017.

United States District Judge