

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

**SOLOCRON MEDIA, LLC,**

**Plaintiff,**

**v.**

**VERIZON COMMUNICATIONS INC., et al.,**

**Defendants.**

**Civil Action No.: 2:13-cv-1059-JRG**

**JURY TRIAL DEMANDED**

**STIPULATED MOTION FOR DISMISSAL WITH PREJUDICE**

The plaintiff, Solocron Media LLC and defendant AT&T Mobility LLC, pursuant to Fed. R. Civ. P. 41(a)(2) and (c), hereby move for an order dismissing all claims in this action WITH PREJUDICE and dismissing all counterclaims as MOOT, with each party to bear its own costs, expenses and attorneys fees.

Dated: May 15, 2015

Respectfully submitted,

*/s/ William P. Nelson*

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AT&T - Exhibit 1040  
AT&T and Verizon v. Solocron Media  
IPR2015-00342

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on May 15, 2015. As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

*/s/ Scott W. Hejny* \_\_\_\_\_

Scott W. Hejny