

**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

Eric H. Findlay
State Bar No. 00789886
Findlay Craft, P.C.
102 North College Avenue
Suite 900
Tyler, TX 75702
Telephone: (903) 534-1100
Facsimile: (903) 534-1137
efindlay@findlaycraft.com

Matthew D. Powers
CA Bar No. 104795 (Admitted E.D. Tex.)
Steven S. Cherensky
CA Bar No. 168275 (Admitted E.D. Tex.)
Paul T. Ehrlich
CA Bar No. 228543 (Admitted E.D. Tex.)
William P. Nelson* Lead Attorney

AT&T - Exhibit 1106
AT&T and Verizon v. Solocron Media
IPR2015-00392

CA Bar No. 196091(Admitted E.D. Tex.)
Robert L. Gerrity
CA Bar No. 268084 (Admitted E.D. Tex.)
Annaka Nava
CA Bar No. 298131 (Admitted E.D. Tex.)
Sam Y. Kim
CA Bar No. 282582 (Admitted E.D. Tex.)
Natasha M. Saputo
CA Bar No. 291151 (Admitted E.D. Tex.)
TENSEGRITY LAW GROUP, LLP
555 Twin Dolphin Drive, Suite 650
Redwood Shores, CA 94065
Telephone: (650) 802-6000
Facsimile: (650) 802-6001
Email:
matthew.powers@tensegritylawgroup.com
steven.cherensky@tensegritylawgroup.com
paul.ehrlich@tensegritylawgroup.com
william.nelson@tensegritylawgroup.com
robert.gerrity@tensegritylawgroup.com
annaka.nava@tensegritylawgroup.com
sam.kim@tensegritylawgroup.com
natasha.saputo@tensegritylawgroup.com

/s/ Scott W. Hejny

Theodore Stevenson, III
Lead Attorney
Texas State Bar No. 19196650
tstevenson@mckoolsmith.com
Scott W. Hejny
Texas State Bar No. 24038952
shejny@mckoolsmith.com
Nicholas Mathews
Texas State Bar No. 24085457
nmathews@mckoolsmith.com
Warren Lipschitz
Texas State Bar No. 24078867
wlipschitz@mckoolsmith.com
Charles E. Fowler, Jr.
Texas State Bar No. 24083014
cfowler@mckoolsmith.com
MCKOOL SMITH, P.C.
300 Crescent Court, Suite 1500
Dallas, Texas 75201
Telephone: (214) 978-4000

Telecopier: (214) 978-4044

ATTORNEYS FOR AT&T MOBILITY LLC

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