IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

TRACBEAM, L.L.C.,

CASE NO. 6:11-cv-96 (LED)

Plaintiff,

Jury Trial Demanded

VS.

AT&T INC., et al,

Defendant.

TELECOMMUNICATION SYSTEMS, INC.,

Plaintiff,

VS.

TRACBEAM, L.L.C.,

Defendant.

CASE NO. 6:12-cv-58 (LED)

Jury Trial Demanded

Joint Motion to Dismiss without prejudice claims and counterclaims between TracBeam, MetroPCS, and TCS

Plaintiff TracBeam, LLC ("TracBeam"), Defendants MetroPCS Communications, Inc. and MetroPCS Wireless Inc. (collectively, "MetroPCS"), and Plaintiff/Consolidated Defendant TeleCommunication Systems, Inc. ("TCS") respectfully move the Court to dismiss without prejudice (1) TracBeam's claims and counterclaims against MetroPCS and TCS and (2) the claims and counterclaims asserted by TCS and MetroPCS against TracBeam in the above-captioned cases.



The parties further move that each party shall bear its own costs, expenses, and attorneys'

fees.

Dated: June 13, 2013

Respectfully submitted,

By: /s/ Jeff Eichmann John Jeffrey Eichmann (admitted to practice before the U.S. District Court for the Eastern District of Texas) CA State Bar No. 227472 Email: jeff@dovellaw.com (admitted to practice before the U.S. District Court for the Eastern District of Texas)

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Attorneys for Consolidated Defendant TeleCommunication Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this 13th day of June 2013, 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/ Jeff Eichmann
John Jeffrey Eichmann

