

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

UNM RAINFOREST INNOVATIONS,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,  
and EMC CORPORATION,

Defendants.

CIVIL ACTION NO. 6:20-CV-00468-ADA

JURY TRIAL DEMANDED

**NOTICE REGARDING WITHDRAWN CLAIMS**

On June 2, 2020, Plaintiff UNM Rainforest Innovations (“UNM”) filed the instant suit against Defendants Dell Technologies, Inc., Dell Inc., and EMC Corporation (collectively “Defendants” or “Dell”), alleging infringement of United States Patent Numbers 8,249,204; 8,565,326; and 8,265,096. UNM’s Complaint asserts that Defendants design, manufacture, import, sell, use, offer for sale, and market products that operate in and with wireless networks that comply with IEEE 802.1ac (“Wi-Fi”). Certain of the accused Dell instrumentalities UNM identified in the Complaint contain products provided by Intel Corporation (“Intel”) that have or provide Wi-Fi capability.

Since that time, UNM and Intel reached resolution regarding UNM’s allegations of infringement directed at Intel products. As such, UNM hereby withdraws with prejudice all claims, whether known or unknown, against or involving past, current, and/or future (1) Intel products with Wi-Fi capability, and (2) products that incorporate or include Intel products with Wi-Fi capability.

Dated: January 15, 2021

Respectfully submitted,

By: /s/ William D. Ellerman

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**COUNSEL FOR PLAINTIFF  
UNM RAINFOREST INNOVATIONS**

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5 on January 15, 2021.

/s/ William D. Ellerman  
William D. Ellerman