

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

AGIS SOFTWARE DEVELOPMENT LLC, §
§ Case No. 2:22-cv-00443-JRG
§ (LEAD CASE)
§
Plaintiff, §
§
§ **JURY TRIAL DEMANDED**
§
v. §
§
HMD GLOBAL, ET AL., §
§
§
Defendants. §
§

AGIS SOFTWARE DEVELOPMENT LLC, §
§ Case No. 2:22-cv-00447-JRG-RSP
§ (MEMBER CASE)
§
Plaintiff, §
§
§ **JURY TRIAL DEMANDED**
§
v. §
§
PANASONIC CORPORATION, ET AL., §
§
§
Defendants. §
§

MOTION TO DISMISS WITH PREJUDICE

Plaintiff AGIS Software Development LLC (“Plaintiff” or “AGIS”) and Defendants Panasonic Corporation and Panasonic Corporation of North America (collectively, “Defendants” or “Panasonic”) (Plaintiff and Defendants, collectively, the “Parties”) have settled their respective claims for relief asserted in this litigation. Accordingly, the Parties respectfully request that all claims for relief asserted against Defendants by AGIS herein be dismissed, with prejudice; and the Parties further request that all attorneys’ fees, costs of court, and expenses by borne by each Party incurring the same.

Dated: July 18, 2024

Respectfully submitted,

/s/ Alfred R. Fabricant

Alfred R. Fabricant
NY Bar No. 2219392
Email: ffabricant@fabricantllp.com
Peter Lambrianakos
NY Bar No. 2894392
Email: plambrianakos@fabricantllp.com
Vincent J. Rubino, III
NY Bar No. 4557435
Email: vrubino@fabricantllp.com

FABRICANT LLP

411 Theodore Fremd Avenue,
Suite 206 South
Rye, New York 10580
Telephone: (212) 257-5797
Facsimile: (212) 257-5796

Justin Kurt Truelove
State Bar No. 24013653
Email: kurt@truelovelawfirm.com
TRUELOVE LAW FIRM, PLLC
100 West Houston Street
Marshall, Texas 75670
Telephone: (903) 938-8321
Facsimile: (903) 215-8510

***ATTORNEYS FOR PLAINTIFF AGIS
SOFTWARE DEVELOPMENT LLC***

/s/ Trey Yarbrough (with permission)

Trey Yarbrough
Bar No. 22133500
Email: trey@yw-lawfirm.com
YARBROUGH WILCOX, PLLC
100 E. Ferguson, Suite 1015
Tyler, Texas 75702
Telephone: 903-595-3111
Facsimile: 903-595-0191

Michael J. Kasdan
Joseph M. Casino
WIGGIN AND DANA, LLP
437 Madison Avenue, 35th Floor
New York, NY 10022
Telephone: 212.551-2603
Facsimile: 212.551.2888

***ATTORNEY FOR DEFENDANTS
PANASONIC HOLDINGS CORPORATION
AND PANASONIC CORPORATION OF
NORTH AMERICA***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on July 18, 2024, 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(a)(3).

/s/ Alfred R. Fabricant
Alfred R. Fabricant

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Plaintiff has met and conferred with counsel for Defendant, and the parties have agreed to the proposed order submitted herewith.

/s/ Alfred R. Fabricant
Alfred R. Fabricant