

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

NEODRON LTD.,

Plaintiff,

v.

DELL TECHNOLOGIES INC.,

Defendant.

Case No. 1:19-cv-00819-ADA

JOINT MOTION TO DISMISS WITH PREJUDICE

WHEREAS, Plaintiff Neodron Ltd., (“Plaintiff”) and Defendant Dell Technologies Inc., (“Defendant”) have resolved Plaintiff’s claims for relief against Defendant and Defendant’s counterclaims for relief against Plaintiff asserted in this case.

NOW, THEREFORE, Plaintiff and Defendant through their attorneys of record, request this Court to dismiss Plaintiff’s claims for relief against Defendant with prejudice and Defendant’s claims, defenses or counterclaims for relief against Plaintiff with prejudice, and with all attorneys’ fees, costs of court and expenses borne by the party incurring same.

Dated: January 4, 2021

Respectfully Submitted,

*Attorneys for Defendant Dell
Technologies Inc.,*

Attorneys for Plaintiff Neodron Ltd

By: /s/ Brady Cox

By: /s/ Reza Mirzaie

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CERTIFICATE OF CONFERENCE

Neodron certifies that counsel for Neodron and counsel for Defendant met and conferred concerning the substance of this Joint Motion to Dismiss with Prejudice and the relief requested on January 2, 2021 Defendant agrees with the Joint Motion and the relief requested.

/s/ Reza Mirzaie
Reza Mirzaie

CERTIFICATE OF SERVICE

I hereby certify that the counsel of record who are deemed to have consented to electronic service are being served on January 4, 2021 with a copy of this document via the Court's ECF system.

/s/ Reza Mirzaie
Reza Mirzaie