

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

NEODRON LTD.,

Plaintiff,

v.

HP INC.,

Defendant.

Case No. 6:19-cv-00319-ADA

**STIPULATED MOTION TO DISMISS WITH PREJUDICE**

Pursuant to Rule 41 of the Federal Rules of Civil Procedure, the Parties move, stipulate and agree subject to and upon the Court's approval that:

- (i) this action, including all claims and counterclaims that were or could have been brought in this action, shall be dismissed with prejudice, pursuant to the Settlement and License Agreement, whose terms shall remain confidential;
- (ii) this Court shall retain continuing jurisdiction over the parties and the subject matter to enforce the Settlement and License Agreement; and
- (iii) each of the Parties shall bear its own costs, expenses and attorneys' fees in this action.

Dated: August 20, 2020

Respectfully submitted,

RUSS, AUGUST & KABAT

By: */s/ Reza Mirzaie*  
Reza Mirzaie (CA SBN 246953)  
Kent N. Shum (CA Bar No. 259189)  
Philip X. Wang (CA Bar No. 262239)  
C. Jay Chung (CA Bar No. 252704)

Paul A. Kroeger (CA Bar No. 229074)  
Brian D. Ledahl (CA Bar No. 186579)  
RUSS, AUGUST & KABAT  
12424 Wilshire Boulevard, 12th Floor  
Los Angeles, California 90025  
Telephone: (310) 826-7474  
Facsimile: (310) 826-6991  
Email: rmirzaie@raklaw.com  
kshum@raklaw.com  
pwang@raklaw.com  
jchung@raklaw.com  
jma@raklaw.com  
cconkle@raklaw.com  
kdavis@raklaw.com  
pkroeger@raklaw.com  
bledahl@raklaw.com

Matthew D. Aichele (VA Bar No. 77821)  
Russ August & Kabat  
800 Main Avenue, SW, Suite 200  
Washington, DC 20024  
Telephone: (202) 664-0623  
Email: maichele@raklaw.com

Attorneys for Plaintiff  
***Neodron Ltd.***

By: /s/ John Michael Guaragna  
John Michael Guaragna  
DLA Piper LLP (US)  
401 Congress, Suite 2500  
Austin, Texas 78701  
Telephone: (512) 457-7125  
Facsimile: (512) 457-7001  
Email: john.guaragna@us.dlapiper.com

Attorney for Defendant  
***HP Inc.***

**CERTIFICATE OF SERVICE**

I certify that on August 20, 2020, a true and correct copy of foregoing document was electronically filed with the Court and served on all parties of record via the Court's CM/ECF system.

**Lead Attorney**  
**John Michael Guaragna**  
DLA Piper LLP (US)  
401 Congress, Suite 2500  
Austin, Texas 78701  
Telephone: (512) 457-7125  
Facsimile: (512) 457-7001  
Email: john.guaragna@dlapiper.com

/s/ Reza Mirzaie  
Reza Mirzaie