

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

SOLAS OLED LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant

Case No. 6:19-cv-00537-ADA

JOINT MOTION TO DISMISS WITHOUT PREJUDICE

Under Federal Rule of Civil Procedure 41(a)(1)(A)(ii) Plaintiff Solas OLED Ltd. and Defendant Apple Inc. jointly stipulate to dismiss the above-captioned case, Case No. 6:19-cv-00537-ADA, without prejudice. The parties further stipulate that each party shall bear its own costs, expenses, and attorneys' fees. Accordingly, the Parties respectfully request that the Court dismiss this case without prejudice. A proposed order is attached.

Dated: January 8, 2021

Respectfully submitted,

/s/ Reza Mirzaie

Reza Mirzaie

Email: rmirzaie@raklaw.com

California State Bar No. 246953

Marc Fenster

California State Bar No. 181067

Email: mfenster@raklaw.com

Neil A. Rubin

California State Bar No. 250761

Email: nrubin@raklaw.com

Philip X. Wang

California State Bar No. 262239

pwang@raklaw.com

Kent N. Shum

California State Bar No. 259189

Email: kshum@raklaw.com

RUSS AUGUST & KABAT
12424 Wilshire Blvd. 12th Floor
Los Angeles, CA 90025
Tel: 310.826.7474

Sean A. Luner
California State Bar No. 165443
E-mail: sean@dovel.com

Gregory S. Dovel
California State Bar No. 135387
Email: greg@dovel.com

Jonas Jacobson
Email: jonas@dovel.com
California State Bar No. 269912

DOVEL & LUNER, LLP
201 Santa Monica Blvd., Suite 600
Santa Monica, CA 90401
Tel: 310.656.7066

T. John Ward, Jr.
Texas State Bar No. 00794818
E-mail: jw@wsfirm.com

Claire Abernathy Henry
Texas State Bar No. 24053063
Email: claire@wsfirm.com

Andrea L. Fair
Texas State Bar No. 24078488
E-mail: andrea@wsfirm.com

WARD, SMITH & HILL, PLLC
PO Box 1231
Longview, TX 75606
Tel: 903.757.6400

**Attorneys for Plaintiff SOLAS OLED,
LTD.**

By: /s/ Michael D. Jay

JOHN M. GUARAGNA
Texas Bar No. 199277
john.guaragna@dlapiper.com
DLA PIPER LLP (US)
401 Congress Avenue, Suite 2500
Austin, TX 78701-3799
Tel: 512.457.7000
Fax: 512.457.7001

MICHAEL D. JAY (pro hac vice)
Bar No. 223827
michael.jay@dlapiper.com

NANDAN R. PADMANABHAN (pro
hac vice)

Bar No. 280309

nandan.padmanabhan@dlapiper.com

DLA PIPER LLP (US)

2000 Avenue of the Stars

Suite 400 North Tower

Los Angeles, California 90067-4704

Tel: 310.595.3000

Fax: 310.595.3300

MARK FOWLER (pro hac vice)

Bar No. 124235

mark.fowler@dlapiper.com

DLA PIPER LLP (US)

2000 University Avenue

East Palo Alto, CA 94303-2214

Tel: 650.833.2000

Fax: 650.833.2001

Attorneys for Defendant Apple Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that on the January 8, 2021, a true and correct copy of the above and foregoing document has been served on all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Philip X. Wang
Philip X. Wang