

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

MAXELL, LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:21-cv-00158-ADA

JOINT MOTION TO DISMISS

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, Plaintiff Maxell, Ltd. (“Maxell”) and Defendant Apple Inc. (Maxell and Apple are collectively, “the Parties”), hereby jointly move for dismissal with prejudice of all claims by Maxell against Apple. The Parties further move for an order that all costs and expenses relating to this litigation up to the time of dismissal shall be borne by the party incurring same. A proposed order accompanies this motion.

Dated: March 24, 2021

Respectfully submitted,

/s/ Michael Chibib

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Dated: March 24, 2021

Respectfully Submitted

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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served this 24th day of March, 2021, with a copy of this document via electronic mail pursuant to Local Rule CV-5(d).

/s/ Michael Chibib

Michael Chibib