

1 GREGORY P. STONE (State Bar No. 78329)  
 gregory.stone@mto.com  
 2 JEREMY K. BEECHER (State Bar No. 301272)  
 Jeremy.beecher@mto.com  
 3 MUNGER, TOLLES & OLSON LLP  
 350 South Grand Avenue, Fiftieth Floor  
 4 Los Angeles, California 90071-3426  
 Telephone: (213) 683-9100  
 5 Facsimile: (213) 687-3702  
 6 CAROLYN HOECKER LUEDTKE (State Bar No. 207976)  
 carolyn.luedtke@mto.com  
 7 MUNGER, TOLLES & OLSON LLP  
 560 Mission Street, Twenty-Seventh Floor  
 8 San Francisco, California 94105  
 Telephone: (415) 512-4000  
 9 Facsimile: (415) 512-4077

10 Attorneys for Plaintiff Intel Corporation

11  
 12 UNITED STATES DISTRICT COURT  
 13 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

14 INTEL CORPORATION,  
 15  
 16 Plaintiff,  
 17 vs.  
 18 DOYLE RIVERS, an individual, and DOES 1  
 through 10, inclusive,,  
 19 Defendant.

Case No. 2:18-cv-03061-MCE-AC

**STIPULATION OF DISMISSAL WITH  
 PREJUDICE AND ORDER  
 DISMISSING CASE**

21 The parties have resolved their dispute and jointly stipulate to the entry of an order  
 22 dismissing this action with prejudice. The parties agree that each will bear its own attorneys'  
 23 fees and expenses. As part of the settlement, Defendant Doyle Rivers has provided a  
 24 certification that he is currently not in possession of Intel confidential information, that he  
 25 has not used or disclosed Intel confidential information, and that he will not in the future use  
 26 or disclose Intel confidential information. The parties have agreed that if it is later  
 27  
 28

1 discovered that this certification is untrue, or if he violates it in the future, that this Court  
2 shall retain jurisdiction over that dispute and the agreed upon remedies provided for in the  
3 Settlement Agreement. The parties therefore request that this Court retain jurisdiction to  
4 enforce the Settlement Agreement between the parties.  
5

6 DATED: January 7, 2020  
7

8 By: /s/ James Kachmar By: /s/ Carolyn Hoecker Luedtke  
9 JAMES KACHMAR CAROLYN HOECKER LUEDTKE  
10 WEINTRAUB TOBIN MUNGER, TOLLES & OLSON LLP  
11 Attorney for Defendant Doyle Rivers Attorneys for Intel Corporation

12 **ECF ATTENTATION**

13 I, Carolyn Hoecker Luedtke, am the ECF user whose account is being used to file this  
14 document. In accordance with Civil Local Rule 5-1(i)(2), I attest that concurrence in the filing of  
15 this document has been obtained from all signatories.  
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**ORDER OF DISMISSAL**

Pursuant to stipulation of the parties, the Court dismisses this action with prejudice. Each party will bear its own attorneys' fees and expenses. Pursuant to the settlement agreement, Defendant Doyle Rivers has provided a certification and the parties have agreed that if he violates the certification, they will file a stipulated joint motion with this Court to enter an agreed upon permanent injunction. As such, this Court will retain jurisdiction to enforce the Settlement Agreement between the parties as well as impose the agreed upon remedies for any violations of the confidentiality certification provided for in the Settlement Agreement.

IT IS SO ORDERED.

Dated: January 10, 2020

  
MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE