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14 Attorneys for Plaintiff and Counter-defendant
 CSR TECHNOLOGY INC.

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
 18 SAN FRANCISCO DIVISION

19 CSR TECHNOLOGY INC., a Delaware
 20 Corporation,

21 Plaintiff,

22 v.

23 FREESCALE SEMICONDUCTOR, INC.,
 24 a Delaware Corporation,

25 Defendant.

CASE NO. 3:12-cv-02619-RS

**STIPULATION AND [~~PROPOSED~~] ORDER
 OF DISMISSAL WITHOUT PREJUDICE
 OF ALL CLAIMS AND COUNTERCLAIMS
 CONCERNING U.S. PATENT NO. 6,757,324
 BETWEEN CSR TECHNOLOGY INC. AND
 FREESCALE SEMICONDUCTOR, INC.**

1 Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiff and Counter-defendant CSR
2 Technology Inc. (“CSR”), on one hand, and Defendant and Counterclaimant Freescale
3 Semiconductor, Inc. (“Freescale”), on the other hand, by and through their respective counsel of
4 record, hereby stipulate and agree as follows:

5 1. In this action, CSR asserts claims of patent infringement under United States
6 Patent Nos. 6,388,590 (the “’590 patent”), 6,388,591 (the “’591 patent”), 6,933,886 (the “’886
7 patent”), 6,882,827 (the “’827 patent”) and 6,757,324 (the “’324 patent”) (collectively, “the
8 patents-in-suit”) against Freescale.

9 2. Freescale filed an Answer and asserted Counterclaims of declaratory judgment of
10 non-infringement and invalidity as to each of the patents-in-suit.

11 3. CSR’s Fourth Claim Of Relief for infringement of the ’324 patent against
12 Freescale in the above-captioned action is hereby dismissed without prejudice. CSR is dismissing
13 only its claims against Freescale relating to the ’324 patent, and expressly maintains all of CSR’s
14 claims for relief against Freescale concerning the ’590 patent (First Claim for Relief), ’591 patent
15 (Second Claim for Relief), ’886 patent (Third Claim for Relief) and ’827 patent (Fifth Claim for
16 Relief) to this action.

17 4. Freescale’s Count IV counterclaim for declaratory judgment for invalidity and
18 non-infringement of the ’324 patent in the above-captioned action is hereby dismissed without
19 prejudice.

20 5. CSR and Freescale each shall bear its own costs and attorneys’ fees in connection
21 with the dismissal of CSR’s Fourth Claim for Relief for infringement of the ’324 patent and
22 Freescale’s Count IV counterclaim for declaratory judgment for invalidity and non-infringement
23 of the ’324 patent.

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Dated: October 19, 2012

DLA PIPER LLP (US)

By /s/ Michael G. Schwartz

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Attorneys for Plaintiff/Counter-defendant
CSR TECHNOLOGY INC.

Dated: October 19, 2012

JONES DAY

By /s/ David L. Witcoff

Patrick T. Michael
David L. Witcoff (Pro Hac Vice)
Timothy J. Heverin (Pro Hac Vice)
Thomas W. Ritchie (Pro Hac Vice)

Attorneys for Plaintiff
FREESCALE SEMICONDUCTOR, INC.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 10/25/12



Honorable Richard Seeborg
United States District Judge

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ECF CERTIFICATION

I, Michael G. Schwartz, am the ECF User whose identification and password are being used to file this Stipulation and [Proposed] Order of Dismissal Without Prejudice of All Claims and Counterclaims Concerning U.S. Patent No. 6,757,324 between CSR Technology Inc. and Freescale Semiconductor, Inc. in compliance with General Order No. 45, Section X(B). I hereby attest that David L. Witcoff has concurred in this filing.

DATED: October 19, 2012

/s/ Michael G. Schwartz
MICHAEL G. SCHWARTZ