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18 DR. MICHAEL JAFFÉ,
19 *in his capacity as Insolvency Administrator*
20 *over the assets of*
21 QIMONDA AG

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Attorneys for Defendants
MAGNACHIP SEMICONDUCTOR
CORPORATION,
MAGNACHIP SEMICONDUCTOR, INC.,
MAGNACHIP SEMICONDUCTOR S.A.,
AND
MAGNACHIP SEMICONDUCTOR, LTD.

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

19 DR. MICHAEL JAFFÉ
20 *in his capacity as Insolvency*
21 *Administrator over the assets of*
22 QIMONDA AG

23 Plaintiff,

24 v.

25 MAGNACHIP SEMICONDUCTOR CORP.,
26 MAGNACHIP SEMICONDUCTOR, INC.,
27 MAGNACHIP SEMICONDUCTOR S.A. and
28 MAGNACHIP SEMICONDUCTOR, LTD.,

Defendants.

Case No. 12-CV-03166-JST

STIPULATION AND ~~PROPOSED~~
ORDER FOR DISMISSAL OF ACTION
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 41(a)

1 WHEREAS, Plaintiff Dr. Michael Jaffé, in his capacity as Insolvency Administrator over
2 the assets of Qimonda AG (“Plaintiff”), and Defendants MagnaChip Semiconductor Corporation,
3 MagnaChip Semiconductor, Inc., MagnaChip Semiconductor S.A., and MagnaChip
4 Semiconductor, Ltd. (collectively “MagnaChip”) have settled this matter on mutually-agreeable
5 terms.

6 NOW, THEREFORE, on the basis of the settlement reached, pursuant to Federal Rule of
7 Civil Procedure 41(a)(1)(A)(ii), IT IS HEREBY STIPULATED AND AGREED, by and
8 between the parties, through their undersigned counsel of record, that:

- 9
- 10 1. The above-captioned action is dismissed without prejudice in its entirety.
 - 11 2. Each party shall bear its own costs and attorneys’ fees.

12 Respectfully submitted this 3rd day of July 2013.

13 DR. MICHAEL JAFFÉ *in his capacity as*
14 *Insolvency Administrator over the assets of*
15 *QIMONDA AG,*

16 /s/ Sanjeet K. Dutta
17 SANJEET K. DUTTA
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Attorneys for Plaintiff
DR. MICHAEL JAFFÉ,
in his capacity as Insolvency

1 Administrator over the assets of
2 QIMONDA AG

3 AKIN GUMP STRAUSS HAUER & FELD LLP

4 /s/ Cono A. Carrano
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20 MAGNACHIP SEMICONDUCTOR
21 CORPORATION,
22 MAGNACHIP SEMICONDUCTOR, INC.,
23 MAGNACHIP SEMICONDUCTOR S.A., AND
24 MAGNACHIP SEMICONDUCTOR, LTD.

25 **DECLARATION OF CONSENT**

26 Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest under
27 penalty of perjury that concurrence in the filing of this document has been obtained from Cono
28 A. Carrano, Counsel for MagnaChip.

Dated: July 3, 2013

By: /s/Sanjeet K. Dutta

Attorney for Plaintiff DR. MICHAEL JAFFÉ in
his capacity as Insolvency Administrator over
the assets of QIMONDA AG

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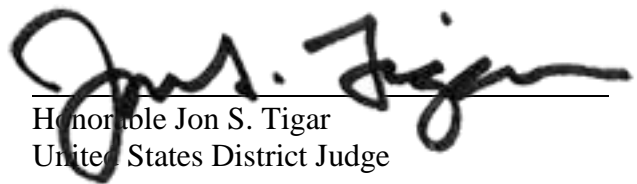
PROPOSED ORDER OF DISMISSAL OF ACTION

In light of the Stipulation of Dismissal filed by Plaintiff Dr. Michael Jaffé, in his capacity as Insolvency Administrator over the assets of Qimonda AG (“Plaintiff”), and Defendants MagnaChip Semiconductor Corporation, MagnaChip Semiconductor, Inc., MagnaChip Semiconductor S.A., and MagnaChip Semiconductor, Ltd. (collectively “MagnaChip”), the Court HEREBY ORDERS as follows:

1. Plaintiff’s claims against MagnaChip are hereby dismissed without prejudice.
2. MagnaChip’s claims against Plaintiff are hereby dismissed without prejudice.
3. Plaintiff and MagnaChip shall each bear their own attorney fees and costs incurred in connection with this action.

SO ORDERED

Dated: July 3, 2013


Honorable Jon S. Tigar
United States District Judge