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16		ATOPTECH, INC.	
17	In Harry on American Covers		
18	UNITED STATES DISTRICT COURT		
19	NORTHERN DISTRICT OF CALIFORNIA		
	SAN FRANCISCO DIVISION		
20			
21	SYNOPSYS, INC.,	Case No. 3:13-cv-02965-MMC (DMR)	
22	Plaintiff,	JOINT STIPULATION OF PARTIAL	
23	V.	DISMISSAL AND [PROPOSED] ORDER	
24	ATOPTECH, INC.,		
25	,		
26	Defendant.		
27			
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		Joint Stipulation and (Proposed) Order Case No. 3:13-cv-02965-MMC (DMR)	
		Case Ind. 3.13-cv-02703-ivite (DIVIK)	

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STIPULATION OF PARTIAL DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiff Synopsys, Inc. ("Synopsys") and Defendant ATopTech, Inc. ("ATopTech"), by and through their respective counsel of record, hereby stipulate and agree as follows:

- 1. The Court, in its Order Construing Claims dated January 19, 2016 (ECF No. 507), held that the claim term "means for identifying a cross-coupled circuit contained within said netlist, wherein said cross-coupled circuit includes a primary net and an aggressor net" of Claims 15-19 of U.S. Patent No. 6,405,348 (the '348 patent) is indefinite.
- 2. The U.S. Patent and Trademark Office's Patent Trial and Appeal Board (PTAB) issued its final decision in *inter partes* review (IPR) case no. IPR2014-01145 finding Claims 1-4 and 7-11 of U.S. Patent No. 6,237,127 (the '127 patent) to be unpatentable. Synopsys did not appeal that decision.
- 3. The PTAB issued its final decision in IPR case no. IPR2014-01150 finding, *inter alia*, Claims 33-36 of U.S. Patent No. 6,567,967 (the '967 patent) to be unpatentable. Synopsys did not appeal the portion of the decision pertaining to Claims 33-36.
- 4. Based on the Court's claim construction order, the parties agree that Synopsys' claim for infringement of Claims 15-19 of the '348 patent should be dismissed with prejudice and that ATopTech's defenses pertaining to Claims 15-19 of the '348 patent should be dismissed without prejudice. By entering into this stipulation, neither party concedes that the rulings in the Court's claim construction order are correct and Synopsys and ATopTech reserve all rights to appeal the Court's claim construction order and all other decisions entered prior to this stipulation.
- 5. In light of the PTAB's decisions in the above-referenced IPR proceedings, the parties agree that all claims pertaining to Claims 1-4 and 7-11 of the '127 patent and Claims 33-36 of the '967 patent are moot.

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1	Dated: June 14, 2016	Respectfully submitted,
2		JONES DAY
3		By: /s/ Patrick T. Michael
4		Patrick T. Michael
5		Attorneys for Plaintiff SYNOPSYS, INC.
6	In accordance with Local Rule 5-1(i)(3), the above signatory attests that concurrence in	
7	the filing of this document has been obtained from the signatory below.	
8		ARNOLD & PORTER
9		By: /s/ Philip W. Marsh
10		Philip W. Marsh
11		Attorneys for Defendant ATOPTECH, INC.
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		Joint Stipulation and (Proposed) Order

[PROPOSED] ORDER OF PARTIAL DISMISSAL IT SO ORDERED, pursuant to Fed. R. Civ. P., Rule 41(a)(2) and the Parties' stipulation, that: Synopsys' claims for infringement of Claims 15-19 of the '348 patent are 1. dismissed with prejudice. 2. ATopTech's defenses pertaining to Claims 15-19 of the '348 patent are dismissed without prejudice. 3. Synopsys' claims for infringement of Claims 1-4 and 7-11 of the '127 patent and Claims 33-36 of the '967 patent are dismissed with prejudice as moot. Dated: _June 14, 2016 United States District Judge