

1  
2 Steven T. Lowe, Esq. SBN 122208  
3 steven@lowelaw.com  
4 Kris LeFan, Esq., SBN 278611  
5 kris@lowelaw.com  
6 LOWE & ASSOCIATES, P.C.  
11400 Olympic Blvd., Suite 640  
Los Angeles, CA 90064  
Telephone: (310) 477-5811  
Facsimile: (310) 477-7672

7 Hao Ni (*pro hac vice*)  
8 hni@nilawfirm.com  
9 NI, WANG & MASSAND, PLLC  
8140 Walnut Hill Lane, Suite 500  
Dallas, TX 75231  
Telephone: (972) 331-4600  
Facsimile: (972) 314-0900

11 *Attorneys for Plaintiff*  
12 *Bluestone Innovations LLC*

13 IN THE UNITED STATES DISTRICT COURT  
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION

16 **BLUESTONE INNOVATIONS LLC,**

17 Plaintiff,

18 v.

19 **PHILIPS ELECTRONICS NORTH**  
20 **AMERICA CORPORATION.,**

21 Defendant

Case No. 3:15-cv-05485-SI

**JOINT MOTION FOR ENTRY OF AN  
ORDER OF DISMISSAL WITH  
PREJUDICE**

1  
2 **JOINT MOTION FOR ENTRY OF AN ORDER REFLECTING THE**  
3 **STIPULATION OF DISMISSAL WITH PREJUDICE**

4 Plaintiff Bluestone Innovations LLC's ("Bluestone") Complaint [Dkt. 1] alleged patent in-  
5 fringement against Defendant Philips Electronics North America Corporation ("Philips").  
6 Philips' Answer to the Complaint denied Bluestone's allegation of patent infringement and as-  
7 serted affirmative defenses but did not raise any counterclaims. Dkt. 28.

8 Pursuant to Fed. R. Civ. P. 41(a), Bluestone and Philips by and through their attorneys, do  
9 hereby jointly move for an order approving their stipulation as follows:

10 All of Bluestone's claims against Philips and this legal action are dismissed with preju-  
11 dice.

12 Each party is to bear its own costs and attorneys' fees with respect to this legal action and  
13 the entry of this Stipulation and Order of Dismissal with Prejudice.

14 The parties respectfully request that the Court an Order adopting this Stipulation of Dis-  
15 missal (with Prejudice) and Proposed Order Thereon as the Order of the Court.

16 Dated: November 30, 2016

**NI, WANG & MASSAND, PLLC**

17 By: /s/ Hao Ni  
18 Hao Ni

19 *Attorney for Plaintiff Bluestone*  
20 *Innovations LLC*

21 Dated: November 30, 2016

**FINNEGAN, HENDERSON, FARABOW,  
22 GARRETT & DUNNER, LLP**

23 By: /s/ Robert F. McCauley  
24 Robert F. McCauley

25 *Attorneys for Defendant*  
26 *Philips Electronics North America*  
27 *Corporation*

**FILER'S ATTESTATION**

28 Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Hao Ni, attest that concurrence in the fil-  
ing of this document has been obtained.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: November 30, 2016

/s/ Hao Ni  
Hao Ni

1  
2 **ORDER OF DISMISSAL**

3 Pursuant to Fed. R. Civ. P. 41(a), Plaintiff Bluestone Innovations LLC (“Bluestone”) and  
4 Defendant Philips Electronics North America Corporation (“Philips”), the parties to this legal ac-  
5 tion, by and through their attorneys, jointly moved for an order approving their stipulation. After  
6 consideration of such motion, it is hereby GRANTED, and it is ORDERED that:  
7

8 1. Bluestone’s claims against Philips and this legal action are dismissed with preju-  
9 dice; and

10 2. Each party is to bear its own costs and attorneys’ fees with respect to this legal ac-  
11 tion and the entry of this Stipulation and Order of Dismissal with Prejudice.  
12

13  
14 Signed this 5<sup>th</sup> day of December, 2016.

15   
16 \_\_\_\_\_  
17 United States District Court Judge  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28