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8 |

9 | **UNITED STATES DISTRICT COURT**

10 | **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

11 |

12 | VERSION2 TECHNOLOGY, INC., a Delaware Company,   **CASE NO. 3:16-CV-04720-LB**

13 | Plaintiff,   **STIPULATION OF DISMISSAL AND [~~PROPOSED~~] ORDER**

14 |

15 | v.

16 | NEILMED PHARMACEUTICALS, INC., a California corporation,

17 | Defendant.

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OGLOZA FORTNEY LLP
ATTORNEYS AT LAW
SAN FRANCISCO

STIPULATION OF DISMISSAL AND [~~PROPOSED~~] ORDER

1	Plaintiff Version2 Technology, Inc. ("Version2") and Defendant NeilMed
2	Pharmaceuticals, Inc. ("NeilMed") stipulate as follows:
3	WHEREAS, on August 17, 2016, Version2 filed its complaint for (1) attempted
4	monopolization in violation of Section 2 of the Sherman Act, (2) declaratory relief, and (3)
5	violation of California Business and Professions Code § 17200, *et seq.*; and
6	WHEREAS, the parties have engaged in settlement discussions, and have reached an
7	agreement as to a settlement.
8	NOW, THEREFORE, the parties, through their respective counsel of record, hereby
9	respectfully request that this Court dismiss this action with prejudice against Defendant NeilMed
10	pursuant to FRCP 41(a)(1)(A).
11	SO STIPULATED.
12	
13	Dated: February 2, 2017 FREEDMAN + TAITELMAN LLP
14	
15	By: /s/ Steven Stiglitz
16	Michael Taitelman Steven Stiglitz
17	Attorneys for Defendant NeilMed Pharmaceuticals, Inc.
18	
19	Dated: February 2, 2017 OGLOZA FORTNEY LLP
20	By: /s/ Darius Ogloza
21	Darius Ogloza Attorneys for Plaintiff
22	Version2 Technology, Inc.
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[PROPOSED] ORDER

Having considered the stipulated request of the parties to dismiss the August 17, 2016 complaint, and finding GOOD CAUSE therefor, the Court hereby issues the following Order:

The action is dismissed with prejudice as against Defendant NeilMed pursuant to FRCP 41(a)(1)(A).

IT IS SO ORDERED.

DATED: ____3/31/2017____, 2016   _____

The Honorable Laurel Beeler

Judge of the Northern District of California

STIPULATION OF DISMISSAL AND [PROPOSED] ORDER