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Attorneys for Defendant
ZYNGA INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

CG TECHNOLOGY DEVELOPMENT, LLC,
INTERACTIVE GAMES LLC, AND
INTERACTIVE GAMES LIMITED,

Plaintiffs and
Counterclaim-Defendants,

v.

ZYNGA, INC.,

Defendant and
Counterclaim-Plaintiff.

CASE NO. 3:17-cv-04354-RS

**STIPULATION OF DISMISSAL AND
ORDER**

1 All responding Parties to the above-captioned action, pursuant to the provisions of Fed. R.
2 Civ. P. 41(a)(1)(A)(ii), hereby stipulate as follows:

- 3 1. The Court has jurisdiction over the subject matter of this action and over the Parties;
- 4 2. All claims brought or raised by Plaintiffs CG Technology Development, LLC,
5 Interactive Games LLC, and Interactive Games Limited (collectively, "Plaintiffs")
6 against Defendant Zynga Inc. ("Zynga") in this action or any predecessor action,
7 including without limitation Case No. 16-cv-00859, filed in the District of Nevada, are
8 dismissed with prejudice;
- 9 3. Plaintiffs, on behalf of themselves and each of their predecessors, successors, assigns,
10 affiliates, divisions, and subsidiaries hereby irrevocably and unconditionally covenant
11 not to bring (or support or encourage a third party to bring) any lawsuit, claim,
12 administrative action, demand, or action against Zynga or any of Zynga's current or
13 future parents, subsidiaries, affiliates, divisions, distributors, direct suppliers,
14 manufacturers, direct and downstream customers, divestitures, and/or acquired entities
15 for any past, current, or future infringement (including direct, indirect, or willful
16 infringement relating to any past, current, or future products) of U.S. Patent Nos.
17 6,899,628, 6,966,832, 6,979,267, 7,029,394, 7,534,169, 8,342,924, 9,111,417, and
18 RE39,818 (collectively, the "Patents-in-Suit"), including any reissue, reexamination,
19 *inter partes* review certificate, or certificate of correction of the Patents-in-Suit;
- 20 4. In exchange for the covenant recited in paragraph 3, Zynga agrees and the Parties
21 stipulate to dismiss with prejudice the counterclaims in Defendant's Answer to
22 Plaintiff's First Amended Complaint for Patent Infringement (ECF No. 74); and
- 23 5. Each Party will bear its own costs and attorneys' fees incurred in this action.

24 IT IS SO STIPULATED

25 DATED this 22nd of July, 2020.

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By: /s/ Erik R. Puknys

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INTERACTIVE GAMES LLC, AND
INTERACTIVE GAMES LIMITED

DURIE TANGRI LLP

By: /s/ Raghav Krishnapriyan
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Attorneys for Defendant
ZYNGA INC.

SIGNATURE ATTESTATION

Counsel for Plaintiffs hereby attests by his signature below that concurrence in
the filing of this document was obtained from counsel for Zynga.

Dated: July 22, 2020

/s/ Erik R. Puknys
Erik R. Puknys

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ORDER

Pursuant to stipulation, **IT IS SO ORDERED,**

Dated: July 22, 2020



The Honorable Richard Seeborg
United States District Judge
Northern District of California