

1 MANATT, PHELPS & PHILLIPS, LLP
 ROBERT D. BECKER (Bar No. CA 160648)
 2 E-mail: rbecker@manatt.com
 RONALD S. KATZ (Bar No. CA 085713)
 3 E-mail: rkatz@manatt.com
 SHAWN G. HANSEN (Bar No. CA 197033)
 4 E-mail: shansen@manatt.com
 1001 Page Mill Road, Building 2
 5 Palo Alto, CA 94304-1006
 Telephone: (650) 812-1300
 6 Facsimile: (650) 213-0260

7 *Attorneys for Plaintiff*
 KELORA SYSTEMS, LLC

8
 9 **UNITED STATES DISTRICT COURT**
 10 **NORTHERN DISTRICT OF CALIFORNIA**
 11 **OAKLAND DIVISION**

13 Kelora Systems, LLC,
 14 Plaintiff,
 15 vs.
 16 Target Corporation, et al.,
 17 Defendant.

No. 11-CV-1548-CW

**STIPULATION OF DISMISSAL WITH
 PREJUDICE BETWEEN PLAINTIFF
 KELORA SYSTEMS, LLC, AND
 DEFENDANT SHOPKO STORES
 OPERATING CO., LLC**

18
 19 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and Civil L.R. 7-12, Plaintiff
 20 Kelora Systems, LLC (“Kelora”), and Defendant Shopko Stores Operating Co., LLC (“Shopko”),
 21 hereby inform the Court that they have entered into a confidential and mutually satisfactory
 22 settlement and therefore stipulate to dismiss all claims between them in this case with prejudice.
 23 Kelora and Shopko agree that each party shall bear its own attorneys’ fees and costs.

1 DATED: July 6, 2011

2

3 By: /s/ Robert D. Becker

4 Robert D. Becker (rbecker@manatt.com)
5 Ronald S. Katz (rkatz@manatt.com)
6 Shawn G. Hansen (shansen@manatt.com)
7 MANATT, PHELPS & PHILLIPS, LLP
8 1001 Page Mill Road, Building 2
9 Palo Alto, CA 94304
10 Tel: (650) 812-1300
11 Fax: (650) 213-0260

12 *Attorneys for Plaintiff*
13 KELORA SYSTEMS, LLC

14

15

16

17

18

19

20

21

By: /s/ J. Daniel Harkins

J. DANIEL HARKINS, pro hac vice
(dharkins@coxsmith.com)
MARISSA HELM, pro hac vice
(mhelm@coxsmith.com)
COX SMITH MATTHEWS
INCORPORATED
112 E. Pecan Street, Suite 1800
San Antonio, Texas 78205
Telephone: (210) 554-5500
Facsimile: (210) 226-8395

M. DAVID BRYANT
California Bar No. 74067
(dbryant@coxsmith.com)
COX SMITH MATTHEWS
INCORPORATED
1201 Elm Street, Suite 3300
Dallas, Texas 75270
Telephone: (214) 698-7801
Facsimile: (214) 698-7899

Attorneys for Defendant
SHOPKO STORES OPERATING CO.,
LLC

SIGNATURE ATTESTATION

22

23

24

25

26

27

28

Pursuant to General Order No. 45(X)(B), I hereby certify that concurrence in the filing of this document has been obtained from the other signatory shown above.

/s/Robert D. Becker

29

30

31

32

33

34

35

DATED: 7/7/2011



Hon. Claudia Wilken
U.S. District Judge

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 6, 2011, all counsel of record who are deemed to have consented to electronic service are being served, via the Court's CM/ECF system pursuant to Civil L.R. 5-4 and General Order 45, with a copy of the foregoing STIPULATION OF DISMISSAL WITH PREJUDICE BETWEEN PLAINTIFF KELORA SYSTEMS, LLC, AND DEFENDANT SHOPKO STORES OPERATING CO., LLC.

By: /s/ Robert D. Becker
Robert D. Becker

300330610.1