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18 Attorneys for Plaintiff
 19 DIGITAL REG OF TEXAS, LLC

20 **UNITED STATES DISTRICT COURT**
 21 **NORTHERN DISTRICT OF CALIFORNIA**
 22 **OAKLAND DIVISION**

23 DIGITAL REG OF TEXAS, LLC,
 24 Plaintiff,

25 v.

26 ADOBE SYSTEMS INCORPORATED,
 27 VALVE CORPORATION, ELECTRONIC
 28 ARTS INC., UBISOFT, INC., SYMANTEC
 CORPORATION, AVG TECHNOLOGIES
 USA, INC., ZYNGA GAME NETWORKS
 INC., ZYNGA, INC., and INTUIT INC.

Defendants.

Case No. 4:12-cv-01971-CW (KAW)

**STIPULATION AND ~~PROPOSED~~
 ORDER OF DISMISSAL AS TO
 DEFENDANT AVG TECHNOLOGIES
 USA, IMC**

1 IT IS HEREBY STIPULTATED AND AGREED, by and between plaintiff Digital Reg of
2 Texas, LLC, ("Plaintiff") and defendant AVG Technologies USA, Inc. ("Defendant"), pursuant to
3 Fed. R. Civ. P. 41(a)(2) and subject to the approval of the Court, that Plaintiff's claims in this
4 action be, and upon approval are, dismissed WITH PREJUDICE and Defendant's counterclaims
5 in this action be, and upon approval are, dismissed WITHOUT PREJUDICE, subject to the terms
6 of that certain agreement entitled "SETTLEMENT AND LICENSE AGREEMENT" dated March
7 20, 2013, with each party to bear its own cost, expenses, and attorney's fees.

8
9 Dated: April 1, 2013

BARTKO ZANKEL TARRANT & MILLER

10 By: /s/ W. Paul Schuck
11 W. Paul Schuck

12 DiNOVO PRICE ELLWANGER & HARDY LLP
13 Andrew G. DiNovo (admitted *Pro Hac Vice*)
14 Adam G. Price (admitted *Pro Hac Vice*)

15 Attorneys for Plaintiff
16 DIGITAL REG OF TEXAS, LLC

17 Dated: April 1, 2013

GOODWIN PROCTER LLP

18 By: /s/ William A. Meunier
19 William A. Meunier (admitted *Pro Hac Vice*)

20 Attorneys for Defendant
21 AVG TECHNOLOGIES USA, INC.

22
23 **ATTESTATION OF E-FILER**

24 In compliance with Local Rule 5-1(i), the undersigned ECF user whose identification and
25 password are being used to file this document, hereby attests that all signatories have concurred in
26 the filing of this document.

27 Dated: April 1, 2013

/s/ W. Paul Schuck
28 W. Paul Schuck

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PROPOSED ORDER OF DISMISSAL

CAME ON THIS DAY for consideration the Stipulation of dismissal with prejudice of all claims asserted by plaintiff Digital Reg of Texas, LLC, against defendant AVG Technologies USA, Inc., and dismissal without prejudice of all counterclaims asserted by defendant AVG Technologies USA, Inc. against plaintiff Digital Reg of Texas, LLC, in this case and the Court being of the opinion that said Stipulation should be ENTERED, it is hereby

ORDERED, ADJUDGED AND DECREED that all of plaintiff's claims asserted against defendant in this suit are hereby dismissed with prejudice and all of defendant's counterclaims asserted in this suit are hereby dismissed without prejudice, subject to the terms of an agreement entitled "SETTLEMENT AND LICENSE AGREEMENT" and dated March 20, 2013.

It is further ORDERED that all attorneys' fees and costs are to be borne by the party that incurred them.

DATED: 4/1/2013


The Honorable Claudia Wilken
United States District Court Judge