

1	Pursuant to Fed. R. Civ. P. 41 and Civ L.R. 7-12, Plaintiff Ipsilium LLC ("Ipsilium") and
2	Defendant Cisco Systems, Inc. ("Cisco") (collectively, "the Parties") hereby jointly stipulate and
3	agree as follows, subject to the approval of the Court, to dismiss their claims and counterclaims
4	against each other:
5	WHEREAS, the Parties have agreed to resolve this action pursuant to a confidential
6	Settlement Agreement; and
7	WHEREAS, Ipsilium desires to dismiss the causes of action stated in its First Amended
8	Complaint (Dkt. No. 15) with prejudice; and
9	WHEREAS, Cisco consents to the dismissal with prejudice of Ipsilium's First Amended
10	Complaint and agrees to dismiss its counterclaims raised in its Amended Answer to Ipsilium
11	LLC's First Amended Complaint, Affirmative Defenses and Counterclaims (Dkt. No. 30);
12	WHEREAS, Ipsilium consents to the dismissal of Cisco's counterclaims;
13	NOW, THEREFORE, the parties hereby stipulate and request the Court to Order that the
14	causes of action stated in Ipsilium's First Amended Complaint be dismissed with prejudice and
15	that Cisco's counterclaims stated in its Answer to First Amended Complaint and Counterclaims be
16	dismissed with prejudice.
17	DATED: June 27, 2019 By <u>/s/ Sean P. DeBruine</u>
18	Sean P. DeBruine (No. 168071)
19	Attorney for Plaintiff IPSILIUM, LLC
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21	By <u>/s/ Sarah E. Piepmeier</u> Sarah E. Piepmeier (No. 227094)
22	Attorney for Defendant
23	CISCO SYSTEMS, INC.
24	PURSUANT TO STIPULATION, IT IS SO ORDERED.
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26	DATED: <u>6/28/2019</u> Hon. Haywood S. Gilliam, Jr.
27	United States District Judge
28	-2-

STIPULATION AND [PROPOSED] ORDER DISMISSING CLAIMS AND COUNTERCLAIMS

CASE NO. 4:17-cv-07179-HSG