

1 NICHOLAS J. SANTORO, ESQ.  
Nevada Bar No. 00532  
2 JAMES D. BOYLE, ESQ.  
Nevada Bar No. 08384  
3 SANTORO, DRIGGS, WALCH,  
KEARNEY, HOLLEY & THOMPSON  
4 400 South Fourth Street, Third Floor  
Las Vegas, Nevada 89101  
5 Telephone: 702/791-0308  
Facsimile: 702/791-1912

6 JAMES P. FOGELMAN, ESQ.  
Nevada Bar No. 09803  
7 GIBSON, DUNN & CRUTCHER LLP  
8 333 South Grand Avenue  
Los Angeles, California 90072-3197  
9 Telephone: 213-229-7000  
Facsimile: 213-229-7520

10 *Attorneys for Caesars License Company, LLC and*  
11 *Caesars Interactive Entertainment, Inc.*

12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 ULTRA INTERNET MEDIA, S.A., a company  
organized under the laws of Nevis, West Indies;  
15 GIGAMEDIA LIMITED, a company organized  
under the laws of the Republic of China  
16 (Taiwan); EVEREST GAMING LIMITED, a  
company organized under the laws of the  
17 Republic of Malta, MANGAS GAMING SAS,  
a company organized under the laws of the  
18 Republic of France; MANGAS EVEREST  
SAS, a company organized under the laws of  
19 the Republic of France; and DOES 1-10,

20  
21 Plaintiff/Counter-Defendants,

22 v.

23 CAESARS LICENSE COMPANY, LLC, a  
Nevada limited liability company; and  
24 CAESARS INTERACTIVE  
ENTERTAINMENT, INC., a Delaware  
25 corporation,  
26

27 Defendants/Counterclaimants.  
28

Consolidated Base Case File No.: 2:10-cv-  
00455-JCM-RJJ

(consolidated with Case No.: 2:10-cv-00607-  
JCM-RJJ)

(consolidated w/ Case No.: 2:10-cv-00904-  
JCM-LRL)

**JOINT NOTICE OF DISMISSAL OF ALL  
CONSOLIDATED MATTERS  
PURSUANT TO FED. R. CIV. P. 41(a)**

1 EVEREST GAMING LIMITED, a company  
2 organized under the laws of the Republic of  
3 Malta,

4 Plaintiff,

5 v.

6 CAESARS INTERACTIVE  
7 ENTERTAINMENT, INC., a Delaware  
8 Corporation; and CAESARS LICENSE  
9 COMPANY, LLC, a Nevada Limited Liability  
10 Company,

11 Defendants.

12 Caesars License Company, LLC and Caesars Interactive Entertainment, Inc.  
13 (collectively, "Caesars"), by and through their undersigned counsel of record, and Ultra Internet  
14 Media, S.A. ("UIM"), Everest Gaming Limited ("Everest"), GigaMedia Ltd. ("GigaMedia"),  
15 Mangas Everest, SAS ("Mangas Everest") and Mangas Gaming, SAS ("Mangas Gaming"), by  
16 and through their undersigned counsel of record, hereby submit this Joint Notice of Voluntary  
17 Dismissal of All Consolidated Matters Pursuant to Fed. R. Civ. P. 41(a) (the "Notice").

18 Specifically, Caesars, UIM, Everest, GigaMedia, Mangas Everest and Mangas Gaming  
19 hereby jointly stipulate and agree as follows:

- 20 1. UIM hereby dismisses each and every one of its claims against Caesars WITH  
21 PREJUDICE, as alleged in Consolidated Base Case No. 2:10-cv-00455-JCM-RJJ;
- 22 2. Caesars hereby dismisses each and every one of its counterclaims against UIM  
23 WITH PREJUDICE, as alleged in Consolidated Base Case No. 2:10-cv-00455-  
24 JCM-RJJ;
- 25 3. Caesars hereby dismisses each and every one of its counterclaims against  
26 GigaMedia WITH PREJUDICE, as alleged in Consolidated Base Case No. 2:10-  
27 cv-00455-JCM-RJJ;
- 28 4. Caesars hereby dismisses each and every one of its counterclaims against Mangas  
Everest WITH PREJUDICE, as alleged in Consolidated Base Case No. 2:10-cv-  
00455-JCM-RJJ;

SANTORO, DRIGGS, WALCH,  
KEARNEY, HOLLEY & THOMPSON



- 1           5.       Caesars hereby dismisses each and every one of its counterclaims against Mangas
- 2                    Gaming WITH PREJUDICE, as alleged in Consolidated Base Case No. 2:10-cv-
- 3                    00455-JCM-RJJ;
- 4           6.       Caesars hereby dismisses each and every one of its claims against UIM WITH
- 5                    PREJUDICE, as alleged in Consolidated Case No. 2:10-cv-00607-JCM-RJJ;
- 6           7.       UIM hereby dismisses each and every one of its counterclaims against Caesars
- 7                    WITH PREJUDICE, as alleged in Consolidated Case No. 2:10-cv-00607-JCM-
- 8                    RJJ; and
- 9           8.       Everest hereby dismisses each and every one of its claims against Caesars WITH
- 10                   PREJUDICE, as alleged in Consolidated Case No. 2:10-cv-00904-JCM-LRL.
- 11           9.       Each of the parties shall pay all of its own legal fees, costs, and any other
- 12                    expenses incurred or to be incurred in connection with the litigation.

13                    In light of the foregoing dismissals, the Parties further stipulate and agree to vacate the  
14                    hearing scheduled for August 25, 2011 regarding pending motions for summary judgment and  
15                    motions for partial summary judgment (*see* Docket No. 280).

16 //  
17 //  
18 //  
19 //  
20 //  
21 //  
22 //  
23 //  
24 //  
25 //  
26 //  
27 //  
28 //

Dated this 16<sup>th</sup> day of August, 2011.

**MARQUIS & AURBACH**

By: Jay Young  
JAY YOUNG, ESQ.  
Nevada Bar No. 05562  
DAVID T. DUNCAN, ESQ.  
Nevada Bar No. 09546  
10001 Park Run Drive  
Las Vegas, Nevada 89145

*Attorneys for Ultra Internet Media, S.A.,  
GigaMedia Limited, and Everest Gaming  
Limited*

**FITZPATRICK, CELLA, HARPER &  
SCINTO**

TIMOTHY J. KELLY, ESQ.  
RALPH A. DENGLER, ESQ.  
*Admitted Pro Hac Vice*  
1290 Avenue of the Americas  
New York, New York 10104-3800

*Attorneys for Everest Gaming Limited*

**HOWARD & HOWARD ATTORNEYS,  
PLLC**

By: /s/ Robert L. Rosenthal, Esq.  
ROBERT L. ROSENTHAL, ESQ.  
Nevada Bar No. 06476  
3800 Howard Hughes Parkway  
Suite 1400  
Las Vegas, Nevada 89169

*Attorneys for Mangas Everest SAS and  
Mangas Gaming SAS*

///

///

///

///

///

**SANTORO, DRIGGS, WALCH,  
KEARNEY, HOLLEY & THOMPSON**

By: /s/ James D. Boyle  
NICHOLAS J. SANTORO, ESQ.  
Nevada Bar No. 00532  
JAMES D. BOYLE, ESQ.  
Nevada Bar No. 08384  
400 S. Fourth Street, Third Floor  
Las Vegas, Nevada 89101

**GIBSON, DUNN & CRUTCHER LLP**

JAMES P. FOGELMAN, ESQ.  
Nevada Bar No. 09803  
SHANNON E. MADER, ESQ.  
California Bar No. 235271  
*Admitted Pro Hac Vice*  
333 South Grand Avenue  
Los Angeles, California 90072-3197

*Attorneys for Caesars Interactive  
Entertainment, Inc., and  
Caesars License Company, LLC*

SANTORO, DRIGGS, WALCH,  
KEARNEY, HOLLEY & THOMPSON



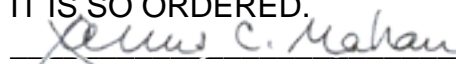


**ORDER**

Pursuant to the stipulation and agreement of counsel for Caesars Interactive Entertainment, Inc., and Caesars License Company, LLC, counsel for Ultra Internet Media, S.A. (“UIM”), GigaMedia Limited (“GigaMedia”), and Everest Gaming Limited (“Everest Gaming”), and counsel for Mangas Everest SAS (“Mangas Everest”) and Mangas Gaming SAS (“Mangas Gaming”) as set forth above, the Court hereby ORDERS and DECREES as follows:

1. UIM’s claims against Caesars, as alleged in Consolidated Base Case No. 2:10-cv-00455-JCM-RJJ, are hereby dismissed WITH PREJUDICE;
2. Caesars’ counterclaims against UIM, as alleged in Consolidated Base Case No. 2:10-cv-00455-JCM-RJJ, are hereby dismissed WITH PREJUDICE;
3. Caesars’ counterclaims against GigaMedia, as alleged in Consolidated Base Case No. 2:10-cv-00455-JCM-RJJ, are hereby dismissed WITH PREJUDICE;
4. Caesars’ counterclaims against Mangas Everest, as alleged in Consolidated Base Case No. 2:10-cv-00455-JCM-RJJ, are hereby dismissed WITH PREJUDICE;
5. Caesars’ counterclaims against Mangas Gaming, as alleged in Consolidated Base Case No. 2:10-cv-00455-JCM-RJJ, are hereby dismissed WITH PREJUDICE;
6. Caesars’ claims against UIM, as alleged in Consolidated Case No. 2:10-cv-00607-JCM-RJJ, are hereby dismissed WITH PREJUDICE;
7. UIM’s counterclaims against Caesars, as alleged in Consolidated Case No. 2:10-cv-00607-JCM-RJJ, are hereby dismissed WITH PREJUDICE;
8. Everest’s claims against Caesars, as alleged in Consolidated Case No. 2:10-cv-00904-JCM-LRL, are hereby dismissed WITH PREJUDICE; and
9. In light of the foregoing dismissals, the Court hereby VACATES the hearing scheduled for August 25, 2011 regarding pending motions for summary judgment and motions for partial summary judgment (*see* Docket No. 280).

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE  
DATED August 18, 2011

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

SANTORO, DRIGGS, WALCH,  
KEARNEY, HOLLEY & THOMPSON

