

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

KONINKLIJKE KPN N.V.,

Plaintiff,

v.

XIAOMI CORPORATION, XIAOMI
COMMUNICATIONS CO., LTD., and
XIAOMI INC.,

Defendants.

C.A. No. 21-cv-41-GBW-CJB

JURY TRIAL DEMANDED

STIPULATION AND [PROPOSED] ORDER TO STAY

WHEREAS, Plaintiff Koninklijke KPN N.V. and Defendants Xiaomi Corporation, Xiaomi Communications Co., Ltd., and Xiaomi Inc. (collectively, “Xiaomi” or “Defendants”) have reached an agreement in principle to resolve all claims in this matter; and

WHEREAS, to avoid burdening the Court with unnecessary proceedings, and to avoid the parties incurring unnecessary costs and expenses the parties agree to stay all remaining deadlines in this matter until February 6, 2023, at which point the parties expect that they will jointly file a stipulation to dismiss all claims with prejudice;

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that this case is stayed until February 6, 2023. If the parties have not filed a stipulation of dismissal by that date, they shall file a joint status report.

Dated: November 25, 2022

FARNAN LLP

Brian E. Farnan

Brian E. Farnan (Bar No. 4089)
Michael J. Farnan (Bar No. 5165)
919 N. Market St., 12th Floor
Wilmington, DE 19801
Tel: (302) 777-0300
Fax: (302) 777-0301
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

Attorneys for Plaintiff

MORRIS, NICHOLS, ARSHT & TUNNELL
LLP

Jeremy A. Tigan

Jack B. Blumenfeld (#1014)
Jeremy A. Tigan (#5239)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@morrisnichols.com
jtigan@morrisnichols.com

Attorneys for Defendants

SO ORDERED this ____ day of November, 2022.

The Honorable Christopher J. Burke