

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ELEMENT CAPITAL COMMERCIAL
COMPANY PTE. LTD,

Plaintiff,

v.

BOE TECHNOLOGY GROUP CO., LTD;
BEIJING BOE DISPLAY
TECHNOLOGY CO., LTD; AND
MOTOROLA (WUHAN) MOBILITY
TECHNOLOGIES COMMUNICATION
CO., LTD.

Defendant.

Civil Action No. 2:22-cv-00118-JRG

JOINT MOTION TO DISMISS

Pursuant to Rule 41 of the Federal Rules of Civil Procedure, Plaintiff Element Capital Commercial Company PTE, LTD. (“Plaintiff”) and Defendants BOE Technology Group Co., Ltd. and Motorola (Wuhan) Mobility Technologies Communication Co., Ltd. (“Defendants”) request this Court dismiss Plaintiff’s claims for relief against Defendants with prejudice and Defendants’ counterclaims for relief against Plaintiff without prejudice. Plaintiff and Defendants agree that all attorneys’ fees, costs of court, and expenses shall be borne by the side that incurred them.

Date: February 26, 2024

Respectfully submitted,

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*Attorneys for Defendant Motorola
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CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2024, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will provide notice to all counsel of record.

/s/ J. Thad Heartfield
J. Thad Heartfield

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Element Capital Commercial Company PTE, LTD. has met and conferred with counsel for Defendants BOE Technology Group Co., Ltd. and Motorola (Wuhan) Mobility Technologies Communication Co., Ltd.

/s/ J. Thad Heartfield
J. Thad Heartfield