IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

UNM RAINFOREST INNOVATIONS, Plaintiff, v. DELL TECHNOLOGIES INC., DELL INC., and EMC CORPORATION, Defendants.	CIVIL ACTION NO. 6:20-CV-00468-ADA JURY TRIAL DEMANDED

NOTICE REGARDING WITHDRAWN CLAIMS

On June 2, 2020, Plaintiff UNM Rainforest Innovations ("UNM") filed the instant suit against Defendants Dell Technologies, Inc., Dell Inc., and EMC Corporation (collectively "Defendants" or "Dell"), alleging infringement of United States Patent Numbers 8,249,204; 8,565,326; and 8,265,096. UNM's Complaint asserts that Defendants design, manufacture, import, sell, use, offer for sale, and market products that operate in and with wireless networks that comply with IEEE 802.1ac ("Wi-Fi"). Certain of the accused Dell instrumentalities UNM identified in the Complaint contain products provided by Intel Corporation ("Intel") that have or provide Wi-Fi capability.

Since that time, UNM and Intel reached resolution regarding UNM's allegations of infringement directed at Intel products. As such, UNM hereby withdraws with prejudice all claims, whether known or unknown, against or involving past, current, and/or future (1) Intel products with Wi-Fi capability, and (2) products that incorporate or include Intel products with Wi-Fi capability.

Dated: January 15, 2021

Respectfully submitted,

By: /s/ *William D. Ellerman*

Charles L. Ainsworth (Texas 00783521)
Robert Christopher Bunt (Texas 00787165)
PARKER, BUNT & AINSWORTH, P.C.
1000 East Ferguson, Suite 418
Tyler, TX 75702
Tel: (903) 531-3535
charley@pbatyler.com
rcbunt@pbatyler.com

Michael W. Shore (Texas 18294915)
Alfonso G. Chan (Texas 24012408)
William D. Ellerman (Texas 24007151)
Corey M. Lipschutz (Texas 24099303)
SHORE CHAN DEPUMPO LLP
901 Main Street, Suite 3300
Dallas, Texas 75202
Tel: (214) 593-9110
Fax: (214) 593-9111
mshore@shorechan.com
achan@shorechan.com
wellerman@shorechan.com
clipschutz@shorechan.com

COUNSEL FOR PLAINTIFF
UNM RAINFOREST INNOVATIONS

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5 on January 15, 2021.

/s/ *William D. Ellerman*
William D. Ellerman