

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

FORAS TECHNOLOGIES Ltd.,

Plaintiff,

v.

TOYOTA MOTOR NORTH AMERICA, INC.
and DENSO CORPORATION,

Defendants.

Case No. 2:23-cv-00150-JRG
(Lead Case)

JURY TRIAL DEMANDED

FORAS TECHNOLOGIES LTD.,

Plaintiff,

v.

KIA CORPORATION and
KIA AMERICA, INC.,

Defendants.

Case No. 2:23-cv-00219-JRG
(Member Case)

JOINT MOTION TO DISMISS

WHEREAS, Plaintiff Foras Technologies Limited (“Foras”) and Defendants Kia Corp. and Kia America Inc. (“Kia” or “Defendants”) have resolved Plaintiff’s claims for relief against Kia.

NOW, THEREFORE, Plaintiff and Defendants, through their attorneys of record, request this Court to dismiss Plaintiff’s claims for relief against Kia in Case No. 2:23-cv-00150-JRG and in Case No. 2:23-cv-00219-JRG and with all attorneys’ fees, costs of court and expenses borne by the party incurring same.

HL Klemove v. Foras Techs.
IPR2024-00813
Exhibit 1030

Dated: May 2, 2024

Respectfully submitted,

By: /s/ Brett Cooper

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Kia America, Inc.*

CERTIFICATE OF CONFERENCE

The undersigned certifies that the parties have complied with the meet and confer requirement in Local Rule CV-7(h). The conference was conducted on May 1-2, 2024, and included Adam Greenfield and David Caine of LATHAM & WATKINS LLP, counsel for Defendants, and Brett Cooper of BC LAW GROUP, P.C., counsel for Plaintiff. This motion is unopposed.

/s/ Brett Cooper
Brett Cooper

CERTIFICATE OF SERVICE

The undersigned certifies that on May 2, 2024, the foregoing document was filed electronically in compliance with Local Rule CV-5(a). This motion was served on all counsel by electronic filing.

/s/ Brett Cooper
Brett Cooper

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Plaintiff,

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KIA AMERICA, INC.,

Defendants.

Case No. 2:23-cv-00219-JRG
(Member Case)

JOINT STIPULATION OF DISMISSAL

On this day, Plaintiff Foras Technologies Ltd. (“Foras”) and Defendants Kia Corp. and Kia America Inc. (“Kia”) (collectively, “the Parties”) announce to the Court that they agree to dismiss all claims for relief pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

IT IS THEREFORE AGREED that all claims for relief asserted against Kia in Case No. 2:23-cv-00150-JRG and in Case No. 2:23-cv-00219-JRG are dismissed; and

IT IS FURTHER AGREED that all attorneys’ fees, costs of court, and expenses shall be borne by each party incurring the same.

Dated: May 2, 2024

Respectfully submitted,

By: /s/ Brett Cooper

Brett E. Cooper (NY SBN 4011011)
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Attorneys for Defendants Kia Corporation and

Kia America, Inc.

CERTIFICATE OF CONFERENCE

The undersigned certifies that the parties have complied with the meet and confer requirement in Local Rule CV-7(h). The conference was conducted on May 1-2, 2024, and included Adam Greenfield and David Caine of LATHAM & WATKINS LLP, counsel for Defendants, and Brett Cooper of BC LAW GROUP, P.C., counsel for Plaintiff. This stipulation is agreed.

/s/ Brett Cooper
Brett Cooper

CERTIFICATE OF SERVICE

The undersigned certifies that on May 2, 2024, the foregoing document was filed electronically in compliance with Local Rule CV-5(a). This motion was served on all counsel by electronic filing.

/s/ Brett Cooper
Brett Cooper

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ORDER OF DISMISSAL

On this day, Plaintiff Foras Technologies Ltd. (“Foras”) and Defendants Kia Corp. and Kia America Inc. (“Kia”) (collectively, “the Parties”) announced to the Court that they have settled this action.

Having considered the Joint Stipulation of Dismissal, which the Court accepts and acknowledges, and finding that good cause exists for granting it, the Court is of the opinion that the Joint Stipulation of Dismissal should be, in all respects, GRANTED.

IT IS THEREFORE ORDERED that all claims for relief asserted against Kia in Case No. 2:23-cv-00150-JRG and in Case No. 2:23-cv-00219-JRG are dismissed; and

IT IS FURTHER ORDERED that all attorneys' fees, costs of court, and expenses shall be borne by each party incurring the same.