IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION

DIALECT, LLC, Plaintiff, v. META PLATFORMS, INC. Defendant.	Civil Action No. 7:25-CV-00060-DC-DTG

JOINT NOTICE OF VOLUNTARY DISMISSAL OF CERTAIN OF PLAINTIFF'S CLAIMS WITHOUT PREJUDICE

Pursuant to the Court's Standing Order Governing Proceedings (OGP) 4.4 – Patent Cases, Plaintiff Dialect LLC ("Dialect") and Defendant Meta Platforms, Inc. ("Meta") hereby file this Joint Notice of Voluntary Dismissal of Certain of Plaintiff's Claims Without Prejudice, and respectfully show as follows:

Plaintiff Dialect hereby voluntarily dismisses, without prejudice, its claims of pre-suit indirect and willful infringement against Meta from the Complaint for Patent Infringement (ECF No. 1) pursuant to and in accordance with the procedure set forth in the Court's Standing OGP 4.4, Section VII. Per the Court's OGP 4.4, the parties agree to permit fact discovery on pre-suit indirect and willful infringement during the first three months of fact discovery. Within those three months after fact discovery opens, Dialect may re-plead its pre-suit indirect and willful infringement allegations with specificity if supported by a good faith basis under Fed. R. Civ. P. 11.

In light of these developments, the parties have also agreed that Meta may have until June 16, 2025 to respond to Dialect's Complaint.

Dated: June 9, 2025

Respectfully submitted,

/s/ Mark D. Siegmund

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel met and conferred to discuss the substantive relief sought in this Motion. The Parties are jointly seeking the relief sought in this Motion.

/s/ Mark D. Siegmund
Mark D. Siegmund

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system on June 9, 2025.

/s/ Mark D. Siegmund
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