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

HEADWATER RESEARCH LLC, Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD and SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	Case No. 2:23-cv-103-JRG-RSP

JOINT MOTION TO DISMISS

WHEREAS, Plaintiff Headwater Research LLC ("Headwater") and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Defendants") have resolved Plaintiff's claims for relief against Defendants and any counterclaims for relief against Plaintiff asserted in this case.

NOW, THEREFORE, Plaintiff and Defendants, through their attorneys of record, request this Court to dismiss Plaintiff's claims for relief against Defendants with prejudice and Defendants' claims, defenses and/or counterclaims for relief against Plaintiff without prejudice, and with all attorneys' fees, costs of court and expenses borne by the party incurring same.

Dated: September 11, 2025

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Defendants conferred with counsel for Plaintiff and that this is a Joint Motion.

/s/ Marc Fenster
Marc Fenster

CERTIFICATE OF SERVICE

I hereby certify that on September 11, 2025, 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(a)(3).

/s/ Marc Fenster
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