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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

YONDR, INC., a Delaware corporation,

Plaintiff/Counter-Defendant,

vs.

WIN ELEMENTS LLC, a California
limited liability company; JOHN
NGUYEN, an individual; and DOES 1-
10, inclusive,

Defendants/Counterclaimants.

RELATED COUNTERCLAIMS

Case No.: 5:21-cv-2105-WLH (KKx)

**STIPULATION RE VALIDITY OF
U.S. PATENT NO. 9,819,788**

Judge: Hon. Wesley L. Hsu
Mag. J.: Kenly Kiya Kato

1 The Parties to the above-entitled litigation have reached a full and final
 2 settlement of their disputes, and wish to terminate all controversies and disputes to
 3 avoid burdening the Court in all aspects of this matter and to move on in the
 4 interests of justice.

5 Therefore the Parties hereby stipulate to and request the Court to enter
 6 judgment on Defendants' Counterclaim Count Two (Declaratory Judgment of
 7 Invalidity of U.S. Patent No. 9,819,788), as provided for in the [Proposed] Final
 8 Judgment of Validity of U.S. Patent No. 9,819,788 submitted concurrently
 9 herewith. A Word version of the proposed judgment and a .pdf copy of this filing
 10 will be provided to the Court via email to WLH_chambers@cacd.uscourts.gov.

11 The parties further stipulate that the remaining claims in this matter may be
 12 dismissed with prejudice, and with each side to bear its own attorneys' fees and
 13 costs, and without a finding that this litigation has been an exceptional case under
 14 35 U.S.C. § 285.

15
 16 IT IS SO STIPULATED.

17 DATED this 5th day of July 2023.

18
 19
 20 By: /s/ Frederic M. Douglas
 (with permission)

21 Frederic M. Douglas, SBN 212778
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23
 24 *Attorney for Defendants,*
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By: /s/ Nika Aldrich

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3 *The filer attests that all other signatories listed, on whose behalf this filing is*
4 *submitted, concur in the filing's content and have authorized filing.*

5 Dated: July 5, 2023

6 By: /s/ Nika Aldrich
7 Nika Aldrich
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