

1 Katherine G. Rubschlager (SBN 328100)
2 ALSTON & BIRD LLP
3 55 2nd Street, Suite 2100
4 San Francisco, California 94105
5 Telephone: (415) 243-1000
6 Facsimile: (415) 243-1001
7 katherine.rubschlager@alston.com

8 *Attorneys for Plaintiff Telcom Ventures LLC*

9 *Additional counsel on signature page*

10 John M. Desmarais (CA SBN 320875)
11 Peter C. Magic (CA SBN 278917)
12 Kevin J. Gu (CA SBN 335053)
13 Kyle Curry (CA SBN 341242)
14 101 California Street
15 San Francisco, CA 94111
16 Tel: 415-573-1900
17 Fax: 415-573-1901
18 jdesmarais@desmaraisllp.com
19 pmagic@desmaraisllp.com
20 kcurry@desmaraisllp.com
21 kgu@desmaraisllp.com

22 *Attorneys for Defendant Apple Inc.*

23 *Additional counsel on signature page*

24 **UNITED STATES DISTRICT COURT**
25 **NORTHERN DISTRICT OF CALIFORNIA**

26 TELCOM VENTURES LLC,

27 Plaintiff,

28 v.

APPLE, INC.,

Defendant.

CASE NO. 5:25-CV-05041-RFL

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO DISMISS COUNTS I, II, V,
AND VIII OF TELCOM VENTURES'
COMPLAINT FOR PATENT
INFRINGEMENT**

1 Pursuant to Fed. R. Civ. P. Rule 41, Plaintiff Telcom Ventures LLC (“Telcom Ventures”) and
2 Defendant Apple Inc. (“Apple”), through their counsel of record, stipulate and agree as follows:

- 3 • Telcom Ventures agrees to dismiss its claims of infringement regarding U.S. Patent No.
4 9,462,411 (the “’411 Patent”), U.S. Patent No. 9,832,708 (the “’708 Patent”), U.S. Patent
5 No. 11,770,756 (the “’756 Patent”), and U.S. Patent No. 12,028,793 (the “’793 Patent”)
6 with prejudice;
- 7 • Telcom Ventures’ Count I (Patent Infringement of the ’411 Patent) is dismissed with
8 prejudice pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii);
- 9 • Telcom Ventures’ Count II (Patent Infringement of the ’708 Patent) is dismissed with
10 prejudice pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii);
- 11 • Telcom Ventures’ Count V (Patent Infringement of the ’756 Patent) is dismissed with
12 prejudice pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii);
- 13 • Telcom Ventures’ Count VIII (Patent Infringement of the ’793 Patent) is dismissed with
14 prejudice pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii);
- 15 • Apple submits that despite this stipulation the parties can address Apple’s pending Motion
16 for Reconsideration (Dkt. 83) as it relates to the remaining patents (and any other issues
17 the Court would like to address) at the currently scheduled September 30, 2025 hearing
18 (Dkt. 97), whereas Telcom Ventures does not believe the hearing is necessary;
- 19 • The parties shall each bear their own costs, expenses, and attorneys’ fees; and
- 20 • All signatories listed, and on whose behalf the filing is submitted, concur in this filing’s
21 content and have authorized the filing.

1 DATED: September 23, 2025

Respectfully submitted,

2 ALSTON & BIRD LLP

DEMARAIS LLP

3 /s/ Kirk T. Bradley

/s/ Peter C. Magic

4 Katherine G. Rubschlager (SBN 328100)
5 55 2nd Street, Suite 2100
6 San Francisco, California 94105
7 Telephone: (415) 243-1000
8 Facsimile: (415) 243-1001
9 katherine.rubschlager@alston.com

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Kevin J. Gu (CA SBN 335053)
Kyle Curry (CA SBN 341242)
101 California Street
San Francisco, CA 94111
Tel: 415-573-1900
Fax: 415-573-1901
jdesmarais@desmaraisllp.com
pmagic@desmaraisllp.com
kcurry@desmaraisllp.com
kgu@desmaraisllp.com

10 Theodore Stevenson, III (admitted *pro hac vice*)
11 Jacob W. Young (admitted *pro hac vice*)
12 2200 Ross Avenue, Suite 2300
13 Dallas, Texas 75201
14 Telephone: (214) 922-3400
15 Facsimile: (214) 922-3899
16 ted.stevenson@alston.com
17 jacob.young@alston.com

Cosmin Maier (pending *pro hac vice*)
Lindsey E. Miller (pending *pro hac vice*)
Joze F. Welsh (pending *pro hac vice*)
Asim H. Zaidi (pending *pro hac vice*)
Ido Sadeh (pending *pro hac vice*)
230 Park Avenue
New York, NY 10169
T: 212-351-3400
F: 212-351-3401
cmaier@desmaraisllp.com
lmiller@desmaraisllp.com
jwelsh@dermaraisllp.com
azaidi@desmaraisllp.com
isadeh@desmaraisllp.com

18 Kirk T. Bradley (admitted *pro hac vice*)
19 Karlee N. Wroblewski (admitted *pro hac vice*)
20 Mary Riolo (admitted *pro hac vice*)
21 1120 South Tryon Street, Suite 300
22 Charlotte, North Carolina 28203
23 Telephone: (704) 444-1000
24 Facsimile: (704) 444-1111
25 kirk.bradley@alston.com
26 karlee.wroblewski@alston.com
27 mary.riolo@alston.com

28 *Attorneys for Plaintiff Telcom Ventures LLC*

Attorneys for Defendant Apple Inc.

ATTESTATION

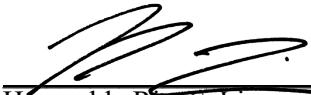
I, Kirk T. Bradley, am the ECF User whose identification and password are being used to file this document. I hereby attest that the concurrence to the filing of this document has been obtained from each signatory hereto in accordance with Civil L.R. 5-1(i)(3).

DATED: September 23, 2025

/s/ Kirk T. Bradley
Kirk T. Bradley

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

2
3 DATED: September 24, 2025


HONORABLE RITA F. LIN
United States District Court Judge
Northern District of California

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