

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

HEADWATER RESEARCH, LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 7:25-cv-00379-ADA

**JOINT MOTION TO DISMISS**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Headwater Research, LLC (“Headwater”) and Defendant Apple Inc. (“Apple”) (collectively, the “Parties”) have settled their respective claims for relief asserted in this litigation. Accordingly, the Parties respectfully request that all claims for relief asserted against Apple by Headwater are dismissed, with prejudice; and, the Parties further request that all attorneys’ fees, costs of court, and expenses be borne by each Party incurring the same.

WHEREFORE, the Parties respectfully request that the Court enter the Proposed Order submitted with this motion.

Dated: October 31, 2025

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Respectfully submitted,

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**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rules CV-7(h) and (i), counsel for the parties met and conferred, and the requested motion is joint.

/s/ Marc Fenster  
Marc Fenster

**CERTIFICATE OF SERVICE**

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on October 31, 2025, with a copy of this document via the Court's CM/ECF.

/s/ Marc Fenster  
Marc Fenster