



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

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

AMAZON.COM SERVICES LLC and  
AMAZON WEB SERVICES, INC.,

*Defendants.*

Case No. 7:25-cv-00286-ADA

**JURY TRIAL DEMANDED**



**NOTICE OF PARTIAL SETTLEMENT**

Plaintiff Headwater Research LLC (“Plaintiff”) respectfully submits this notice of partial settlement as to any claims and liability in this proceeding associated with any products and services of non-party Apple Inc (“Apple”). On October 28, 2025, Headwater and Apple Inc. entered into a worldwide settlement whereby Headwater licensed its patents to Apple and released its claims against Apple and any claims in has against Defendants in the above-captioned action pertaining to Apple’s products and services.

Headwater acknowledges that it has executed a settlement agreement with Apple that satisfies any claims against Defendants associated with Apple’s products and services. Pursuant to Headwater’s settlement with Apple, Headwater will not pursue in these proceedings any claims against and liability owed by Defendants associated with Apple products and services.

Because Headwater’s complaint does not allege infringement as to any Apple products or services, Headwater does not believe any amendment to the complaint is necessary. But for the avoidance of doubt, Headwater confirms herein that it has no claim against Defendants associated with Apple’s products and services.

Dated: November 10, 2025

Respectfully submitted,

/s/ Marc Fenster

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**ATTORNEYS FOR PLAINTIFF**  
**Headwater Research LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on November 10, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court for the Western District of Texas under seal, and served counsel of record with a copy via electronic email.

/s/ Marc Fenster

Marc Fenster