



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

HEADWATER RESEARCH LLC,

Plaintiff,

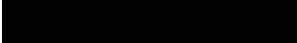
v.

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

Marc Fenster
CA State Bar No. 181067
Email: mfenster@raklaw.com

Reza Mirzaie
CA State Bar No. 246953
Email: rmirzaie@raklaw.com

Brian Ledahl
CA State Bar No. 186579
Email: bledahl@raklaw.com

Dale Chang
CA State Bar No. 248657
Email: dchang@raklaw.com

Kristopher Davis,
CA State Bar No. 329627
Email: kdavis@raklaw.com

James N. Pickens,
CA State Bar No. 307474
Email: jpickens@raklaw.com

James S. Tsuei
CA State Bar No. 285530
Email: jtsuei@raklaw.com

Jason M. Wietholter
CA State Bar No. 337139
Email: jwietholter@raklaw.com

Paul A. Kroeger
CA Bar No. 229074
pkroeger@raklaw.com

RUSS AUGUST & KABAT
12424 Wilshire Blvd. 12th Floor
Los Angeles, CA 90025
Telephone: 310-826-7474

Qi (Peter) Tong
TX State Bar No. 24119042
Email: ptong@raklaw.com
RUSS AUGUST & KABAT
8080 N. Central Expy., Suite 1503
Dallas, TX 75206
Telephone: 310-826-7474

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