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17 **UNITED STATES DISTRICT COURT**  
18 **SOUTHERN DISTRICT OF CALIFORNIA**

19  
20 CLEAR IMAGING RESEARCH LLC,  
21 Plaintiff,  
22 v.  
23 GOOGLE LLC,  
24 Defendant.

Case No. 3:25-CV-00221-GPC-BLM  
**JOINT MOTION TO DISMISS**

1 Plaintiff and Counter-Defendant Clear Imaging Research LLC (“Clear  
2 Imaging” or “Plaintiff”) and Defendant and Counterclaimant Google LLC (“Google”  
3 or “Defendant”) (each a “Party” and collectively “the Parties”), respectfully submit  
4 this Joint Motion requesting that the Court dismiss with prejudice Clear Imaging’s  
5 claims for infringement of U.S. Patent No. 9,860,450 (“the ’450 Patent”) as well as  
6 dismiss Google’s counterclaims for declaratory judgment of non-infringement and  
7 invalidity of the ’450 Patent without prejudice pursuant to Federal Rule of Civil  
8 Procedure 41(a)(2).<sup>1</sup>

9 Clear Imaging and Google respectfully request that the Court enter the  
10 proposed order dismissing with prejudice Clear Imaging’s claims for infringement of  
11 the ’450 Patent and without prejudice Google’s counterclaims for declaratory  
12 judgment of non-infringement and invalidity of the ’450 Patent, and all corresponding  
13 claims for relief against either Party with regard to the ’450 Patent, with each Party  
14 bearing all attorney’s fees, costs of court, and expenses incurred by that Party with  
15 regard to the ’450 Patent.

16 Respectfully submitted,

17 Dated: January 28, 2026

/s/ Jennifer M. French  
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20 Dated: January 28, 2026

/s/ Andrew Klein  
Andrew Klein  
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27 <sup>1</sup> The Court dismissed Clear Imaging’s claims with respect to U.S. Patent Nos.  
28 9,800,788, 9,013,587, 11,595,583, 10,171,740, 11,165,961, and 11,457,149 after  
finding those patents claimed patent-ineligible subject matter and therefore invalid  
under 35 U.S.C. § 101. See Dkt. Nos. 26, 51.

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**FILER’S ATTESTATION**

I, Jennifer M. French, hereby certify that the content of this document is acceptable to all persons required to sign this document and that I obtained the authorizations necessary for the electronic signatures of all parties as required by Section 2(f)(4) of the ECF Administrative Policies and Procedures Manual.

*/s/ Jennifer M. French*  
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