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 16 Document Security Systems, Inc.

17
 18 **IN THE UNITED STATES DISTRICT COURT**
FOR THE CENTRAL DISTRICT OF CALIFORNIA
 19 **SOUTHERN DIVISION**

20 DOCUMENT SECURITY SYSTEMS,
 INC.,

21 Plaintiff,

22 v.

23 OSRAM GMBH; OSRAM OPTO
 24 SEMICONDUCTORS GMBH & CO.;
 OSRAM Licht AG; and OSRAM
 25 SYLVANIA INC.,

26 Defendants.

Case No. 2:17-cv-05184-JVS-JCG

STIPULATION AND
JOINT MOTION TO DISMISS
WITH PREJUDICE

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1 Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure and the
2 agreement of the Parties, Plaintiff Document Security Systems, Inc. ("DSS") and
3 Defendant OSRAM SYLVANIA Inc. ("OSI"), by and through their counsel of
4 record, hereby stipulate to the dismissal of the above-captioned litigation in its
5 entirety, with prejudice, as follows:

6
7 1. All claims and counterclaims that DSS asserted against OSI, and against
8 un-served Defendants OSRAM GmbH, OSRAM Opto Semiconductors
9 GmbH, and OSRAM Licht AG,¹ in the above-captioned litigation are
10 dismissed in their entirety, with prejudice.

11
12 2. All claims and counterclaims that OSI asserted against DSS in the above-
13 captioned litigation are dismissed in their entirety, with prejudice.

14
15 3. The parties shall each bear their own costs and attorneys' fees associated
16 with the above-captioned litigation.

17
18 A proposed Order of Dismissal With Prejudice is filed concurrently herewith.

19
20 DATED: March 12, 2018

Respectfully submitted,

21
22 /s/ Brian Ledahl
23 Brian Ledahl
24 RUSS AUGUST & KABAT
25 *Attorneys for Plaintiff*
Document Security Systems, Inc.

/s/ Benjamin W. Hattenbach
Benjamin W. Hattenbach
IRELL & MANELLA LLP
Attorneys for Defendant
OSRAM SYLVANIA Inc.

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27 ¹ Defendants OSRAM GmbH, OSRAM Opto Semiconductors GmbH, and
28 OSRAM Licht AG were not served with the Complaint or First Amended Complaint
and have not appeared in this litigation. As to these defendants, the dismissal with
prejudice is pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure.

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ATTESTATION OF AUTHORIZATION

Pursuant to Central District of California Local Rule 5-4.3.4(a)(2)(i), I hereby certify that the content of this document is acceptable to Brian Ledahl, counsel for Plaintiff, and I have obtained his authorization to affix his electronic signature to this document.

DATED: March 12, 2018

By: /s/ Benjamin W. Hattenbach
Benjamin W. Hattenbach