

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MARSHALL FEATURE RECOGNITION, LLC	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Case No. 2:15-cv-01782
	§	
	§	LEAD CASE
	§	
RAYMOND JAMES FINANCIAL, INC., et al.,	§	
<i>Defendants.</i>	§	

MARSHALL FEATURE RECOGNITION, LLC	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Case No. 2:15-cv-01807
	§	
	§	CONSOLIDATED CASE
	§	
JUNIPER NETWORKS, INC.,	§	
<i>Defendant.</i>	§	

JOINT STIPULATION OF DISMISSAL

Marshall Feature Recognition, LLC (“MFR”) commenced this action against Defendant Juniper Networks, Inc. (“Juniper”) on November 23, 2015, alleging infringement of U.S. Patent Nos. 6,886,750 (the “750 patent”) and 8,910,876 (the “876 patent”). MFR now seeks to voluntarily dismiss its claims against Juniper with prejudice, and in order to fully resolve and terminate its litigation against Juniper, MFR and Juniper hereby jointly stipulate to the following:

1. Pursuant to Fed. R. Civ. P. 41, MFR hereby dismisses with prejudice all claims that were or could have been asserted against Juniper in this action.

2. MFR's dismissal with prejudice fully exhausts any and all past, present, and/or future claims against Juniper and any Juniper affiliate or customer with respect to these and any other rights that MFR presently owns or acquires.
3. Pursuant to Fed. R. Civ. P. 41, Juniper hereby dismisses without prejudice its counterclaims asserted against MFR in this action. Juniper further covenants not to assert any litigation involving the '750 patent or the '876 patent against MFR, unless MFR initiates a lawsuit against Juniper with respect to the '750 patent or the '876 patent.
4. MFR's dismissal of its claims against Juniper is not the result of any settlement agreement, license, or payment to MFR.
5. Juniper will forego seeking sanctions, attorneys' fees, and/or costs from MFR in connection with the above-captioned matter. Pursuant to Fed. R. Civ. P. 41(d), however, Juniper reserves the right to seek sanctions, attorneys' fees, and/or costs from MFR in the event that any effort is made to subsequently assert the '750 patent or the '876 patent against Juniper, or any its affiliated companies.

Dated: November 1, 2016

Respectfully Submitted:

/s/ Austin Hansley (with permission)

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Attorneys for Juniper Networks, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2016, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of Texas, Marshall Division, via the CM/ECF system, which will send a notice of filing to all counsel of record who have consented to service by electronic means.

/s/ Alan M. Fisch
Alan M. Fisch

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MARSHALL FEATURE
RECOGNITION, LLC

Plaintiff,

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RAYMOND JAMES FINANCIAL, INC.,
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Defendants.

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LEAD CASE

MARSHALL FEATURE
RECOGNITION, LLC

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Case No. 2:15-cv-01807

CONSOLIDATED CASE

ORDER

CAME ON THIS DATE for consideration the Joint Stipulation of Dismissal WITH PREJUDICE of all claims asserted by Plaintiff Marshall Feature Recognition, LLC, against Defendant Juniper Networks, Inc., and WITHOUT PREJUDICE all counterclaims asserted by Defendant Juniper Networks, Inc. against Plaintiff Marshall Feature Recognition, LLC, and the Court being of the opinion that said stipulation should be GRANTED.

SIGNED this 1st day of November, 2016.



ROY S. PAYNE
UNITED STATES MAGISTRATE JUDGE