

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

GEOTAG INC.,

Plaintiff,

v.

STARBUCKS CORP., et al.,

Defendants.

Case No. 2:10-cv-00572

JOINT STIPULATION FOR DISMISSAL WITH PREJUDICE

GeoTag Inc. (“Plaintiff”) and Doctor’s Associates, Inc. d/b/a/ Subway (“Defendant”), pursuant to FED. R. CIV. P. 41(a)(2), hereby move for an order dismissing claims in this action asserted by Plaintiff against Defendant as follows:

A. Plaintiff hereby moves to dismiss WITH PREJUDICE its claims and causes of action against Defendant that relate solely to Defendant’s job locator instrumentality.

Each party will bear its own costs and fees thus far incurred.

Dated: February 20, 2014

Respectfully submitted,

By: /s/ Jeffrey A. Tinker

Jeffrey A. Tinker
Texas Bar No. 24060733
jtinker@winstead.com
Winstead PC
500 Winstead Building
2728 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 745-5400
Facsimile: (214) 745-5390

Joel Reese
State Bar No. 00788258
Adam C. Sanderson
State Bar No. 24056264
750 N. St. Paul Street, Ste. 610
Dallas, Texas 75201-3202
(214) 382-9810 (Telephone)
e-mail: joel.reese@rgmfirm.com
adam.sanderson@rgmfirm.com

David R. Bennett
Direction IP Law
P.O. Box 14184
Chicago, IL 60614-0184
Telephone: (312) 291-1667
e-mail: dbennett@directionip.com

**ATTORNEYS FOR PLAINTIFF GEOTAG,
INC.**

/s/ Michael J. Bettinger

Michael J. Bettinger (*pro hac vice*)

California State Bar No. 122196

mike.bettinger@klgates.com

Irene Yang

California State Bar No. 245464

irene.yang@klgates.com

K&L Gates LLP

Four Embarcadero Center, Suite 1200

San Francisco, CA 94111

(415) 882-8200

Michael J. Abernathy (*pro hac vice*)

michael.abernathy@klgates.com

Brian J. Arnold (*pro hac vice*)

brian.arnold@klgates.com

K&L Gates LLP

70 West Madison Street, Suite 3100

Chicago, IL 60602

Steven G. Schortgen

Texas State Bar No. 00794603

steve.schortgen@klgates.com

K&L Gates LLP

1717 Main Street, Suite 2800

Dallas, TX 75201

(214) 939-5500

**ATTORNEYS FOR DEFENDANT
DOCTOR'S ASSOCIATES, INC. (D/B/A/
SUBWAY)**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document *via* the Court's CM/ECF system per Local Rule CV-5(a)(3) on this 20th day of February, 2014.

/s/ Jeffrey Tinker
Jeffrey Tinker