IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WALKER DIGITAL, LLC, Plaintiff, v. GOOGLE INC., Defendant.	C.A. No. 11-989-RGA **JURY TRIAL DEMANDED**
WALKER DIGITAL, LLC, Plaintiff, v. AMAZON.COM, Defendant.	C.A. No. 11-990-RGA **JURY TRIAL DEMANDED**
WALKER DIGITAL, LLC, Plaintiff, v. VIBRANT MEDIA, INC., Defendant.	C.A. No. 11-993-RGA **JURY TRIAL DEMANDED**

STIPULATION AND [PROPOSED] ORDER OF DISMISSAL

WHEREAS, a reexamination certificate issued on December 11, 2014, cancelling all claims of U.S. Patent No. 8,041,711 ("the '711 patent"), the asserted patent in the above-captioned cases.

Pursuant to Rule 41 of the Federal Rules of Civil Procedure, Plaintiff Walker Digital, LLC ("Plaintiff") and Defendants Google Inc., Amazon.com, and Vibrant Media, Inc., (collectively "Defendants") through their respective undersigned counsel, hereby jointly stipulate that all claims asserted by Plaintiff, including any claims by Inventor Holdings, LLC, related to the '711 patent, be dismissed WITH PREJUDICE and that all counterclaims asserted by Defendants be dismissed WITHOUT PREJUDICE, with each party to bear its own costs, expenses and fees.

Dated: January 7, 2015

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IT IS SO ORDERED this ____ day of _____, 2015.

_____
The Honorable Richard G. Andrews
United States District Judge