

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BIO-RAD LABORATORIES, INC., THE)	
UNIVERSITY OF CHICAGO, LAWRENCE)	
LIVERMORE NATIONAL SECURITY)	
LLC, and PRESIDENT AND FELLOWS OF)	
HARVARD COLLEGE,)	C.A. No. 20-cv-506-RGA
)	
Plaintiffs,)	DEMAND FOR JURY TRIAL
)	
v.)	
)	
DROPWORKS, INC.)	
Defendant.)	

**JOINT STIPULATION
AND [PROPOSED] ORDER OF DISMISSAL**

WHEREAS, Bio-Rad Laboratories, Inc. (“Bio-Rad”) and the University of Chicago (“Chicago”) asserted claims of infringement of U.S. Patent Nos. 8,304,193 (“the ’193 patent”) and U.S. Patent No. 8,822,148 (“the ’148 patent”) against Dropworks, Inc. (“Dropworks”) (D.I. 71);

WHEREAS, Bio-Rad asserted claims of infringement of U.S. Patent No. 9,127,310 (“the ’310 patent”) and U.S. Patent No. 9,132,394 (“the ’394 patent”) against Dropworks (*id.*);

WHEREAS, Bio-Rad and Lawrence Livermore National Security (“LLNS”) asserted claims of infringement of U.S. Patent No. RE41,780 (“the ’780 patent”) and U.S. Patent No. RE43,365 (“the ’365 patent”) against Dropworks (*id.*);

WHEREAS Bio-Rad and President and Fellows of Harvard College (“Harvard”) asserted claims of infringement of U.S. Patent No. 9,056,289 (“the ’289 patent”) against Dropworks (*id.*);

WHEREAS, Dropworks has further asserted affirmative defenses and counterclaims seeking declaratory judgment of non-infringement and invalidity of the of the ’193, ’148, ’310, ’394, ’780, ’365, and ’289 patents (D.I. 77);

WHEREAS, Plaintiff Bio-Rad has completed an acquisition of Dropworks such that Dropworks is now a wholly owned subsidiary of Bio-Rad such that Plaintiffs and Dropworks have mutually agreed to settle their respective claims;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and Dropworks, through their respective undersigned counsel, subject to the approval of the Court:

1. To dismiss without prejudice Plaintiffs' claims for infringement against Dropworks (D.I. 71, Counts I-XIV).

2. To dismiss with prejudice Dropworks' counterclaims for non-infringement and invalidity against Plaintiffs (D.I.77, Counts I-XVI);

3. Each party shall bear its own costs, expenses, and attorneys' fees incurred with respect to all claims, defenses, and counterclaims in this Action.

Dated: October 18, 2021

Respectfully submitted,

FARNAN LLP

RICHARDS, LAYTON & FINGER, P.A.

/s/ Brian E. Farnan

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IT IS SO ORDERED this ____ day of October, 2021.

The Honorable Richard G Andrews