

WHEREAS, the parties desire to minimize motion practice so as to most efficiently deploy limited resources in support of this dispute;

NOW, THEREFORE, Dali and each of the AT&T Defendants, Ericsson Defendants, and CommScope Defendants hereby stipulate, subject to the approval and order of the Court, as follows:

1. The above-captioned action will be severed into two actions, one naming as defendants the AT&T Defendants and CommScope Defendants, and one naming as defendants the AT&T Defendants and Ericsson Defendants;

2. The severed actions will be formally consolidated for all pre-trial purposes, subject to the approval of the Court;

3. Following severance, no Defendant will move to transfer venue to any other court;

4. Each side will bear its own fees and costs with respect to the Motion to Sever and Stay Pending Final Resolution of Supplier Lawsuits solely as it relates to Defendants' request to sever;

5. No Defendant will rely on the fact of severance in support of or opposition to Defendants' Motion to Sever and Stay Pending Final Resolution of Supplier Lawsuits as it relates to Defendants' request to stay the AT&T Defendants; and

6. All parties reserve all available rights both as to the Motion to Sever and Stay Pending Final Resolution of Supplier Lawsuits as it relates to Defendants' request to stay the AT&T Defendants, and otherwise.

Dated: October 14, 2022

Respectfully submitted,

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IT IS SO ORDERED this ____ day of _____, 2022.

U.S.D.J.

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of October 2022, I electronically filed the foregoing with the clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

By: /s/ Joseph M. Abraham
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