

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

KOSS CORPORATION,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:20-cv-00665-ADA

**JURY TRIAL DEMANDED**

**JOINT STIPULATION OF DISMISSAL**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Koss Corporation (“Koss”) and Defendant Apple Inc. (“Apple”) hereby state that the parties have resolved all matters in controversy between them. Accordingly, Koss and Apple stipulate that the claims brought by Koss against Apple should be dismissed WITH PREJUDICE and the claims brought by Apple against Koss in the above-captioned action (including any consolidated action) should be dismissed WITHOUT PREJUDICE.

For this reason, Koss and Apple ask that the Court enter the attendant proposed Order of Dismissal, with each party to bear its own costs, expenses, and attorneys’ fees.

Dated: July 23, 2022

Respectfully submitted,

By: /s/ Benjamin E. Weed  
Darlene F. Ghavimi  
Texas Bar No. 24072114  
**K&L GATES LLP**  
2801 Via Fortuna, Suite #350  
Austin, TX 78746  
Tel: (512) 482-6800  
Fax: (512) 482-6859

By: /s/ Michael T. Pieja  
Michael T. Pieja (*pro hac vice*)  
Alan E. Littmann (*pro hac vice*)  
Doug Winnard (*pro hac vice*)  
Brian O’Donoghue (*pro hac vice*)  
Samuel E. Schoenburg (*pro hac vice*)  
Jennifer M. Hartjes (*pro hac vice*)  
Sarah Kinter (*pro hac vice* to be filed)

darlene.ghavimi@klgates.com

Jim Shimota (admitted *pro hac vice*)  
Benjamin E. Weed  
(admitted *pro hac vice*)  
Philip A. Kunz  
(admitted *pro hac vice*)  
Erik J. Halverson  
(admitted *pro hac vice*)  
Gina E. Johnson  
(admitted *pro hac vice*)

**K&L GATES LLP**

70 W. Madison Street, Suite 3100  
Chicago, IL 60602  
Tel: (312) 372-1121  
Fax: (312) 827-8000  
jim.shimota@klgates.com  
benjamin.weed@klgates.com  
philip.kunz@klgates.com  
erik.halverson@klgates.com  
gina.johnson@klgates.com

Peter E. Soskin  
(admitted *pro hac vice*)

**K&L GATES LLP**

4 Embarcadero Center, Suite 1200  
San Francisco, CA 94111  
Tel: (415) 882-8200  
Fax: (415) 882-8220  
peter.soskin@klgates.com

David N. Deaconson  
State Bar No. 05673400

**PAKIS, GIOTES, PAGE & BURLESON**

P.O. Box 58  
Waco, TX 76703-0058  
(254) 297-7300  
Fax: 254-297-7301  
Email: deaconson@pakislaw.com

***Counsel for Plaintiff Koss Corporation***

**GOLDMAN ISMAIL TOMASELLI  
BRENNAN & BAUM LLP**

200 South Wacker Dr., 22nd Floor  
Chicago, IL 60606  
Tel: (312) 681-6000  
Fax: (312) 881-5191  
mpieja@goldmanismail.com  
alittmann@goldmanismail.com  
dwinnard@goldmanismail.com  
bodonoghue@goldmanismail.com  
sschoenburg@goldmanismail.com  
jhartjes@goldmansimail.com  
skinter@goldmanismail.com

Stephen E. McConnico  
State Bar No. 13450300  
Steven J. Wingard  
State Bar No. 00788694  
Stephen L. Burbank  
State Bar No. 24109672  
Paige Arnette Amstutz  
State Bar No. 00796136

**SCOTT DOUGLASS & McCONNICO**

Colorado Tower  
303 Colorado St., Ste. 2400  
Austin, TX 78701  
Tel: (512) 495-6300  
Fax: (512) 495-6399  
smcconnico@scotttdoug.com  
swingard@scotttdoug.com  
sburbank@scotttdoug.com  
pamstutz@scotttdoug.com

***Counsel for Defendant Apple Inc.***

**CERTIFICATE OF SERVICE**

I hereby certify that on July 22, 2022, a true and correct copy of the foregoing document was served on all counsel of record by email.

/s/ Benjamin E. Weed  
BENJAMIN E. WEED