

1 Edward M. Anderson (SBN 198183)

2 edward@andersonyehlaw.com

3 Regina Yeh (SBN 266019)

4 regina@andersonyehlaw.com

5 **ANDERSON YEH PC**

6 1055 E. Colorado Blvd. Ste 500

7 Pasadena, California 91106

8 Tel: (626) 204-4092 / Fax: (888) 744-0317

9 Attorneys for Plaintiff Alcon Entertainment, LLC

10 Matthew T. Kline (SBN #211640)

11 mkline@omm.com

12 Cassandra L. Seto (SBN #246608)

13 cseto@omm.com

14 **O'MELVENY & MYERS LLP**

15 1999 Avenue of the Stars, 8th Floor

16 Los Angeles, California 90067

17 Tel: (310) 553-6700/ Fax: (310) 246-6779

18 Attorneys for Defendant Warner Bros. Discovery,
19 Inc.

20 [Additional counsel listed on following page]

21 **UNITED STATES DISTRICT COURT**

22 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

23 ALCON ENTERTAINMENT, LLC,
24 a Delaware Limited Liability Company,

25 Plaintiff,

26 v.

27 TESLA, INC., a Texas Corporation;
28 ELON MUSK, an individual;
WARNER BROS. DISCOVERY, INC.,
a Delaware Corporation,

CASE NO. 2:24-CV-09033-GW RAO

Hon. George H. Wu – District Judge

**JOINT STIPULATION FOR
DISMISSAL WITH PREJUDICE OF
PLAINTIFF'S THIRD AMENDED
COMPLAINT AS AGAINST
DEFENDANT WARNER BROS.
DISCOVERY, INC. PURSUANT TO
FED. R. CIV. PRO. 41(a)(1)(A)(ii)**

1 Arwen R. Johnson (SBN 247583)
2 Arwen.Johnson@kslaw.com
3 Lennette W. Lee (SBN 263023)
4 Llee@kslaw.com
5 **KING & SPALDING LLP**
6 633 West Fifth Street, Suite 1600
7 Los Angeles, California 90071
8 Tel: (213) 443-4355 / Fax: (213) 443-4310
9 Attorneys for Defendants Tesla, Inc. and Elon Musk

9 A. Louis Dorny (SBN 212054)
10 ldorny@tesla.com
11 Terry W. Ahearn (SBN 216543)
12 tahearn@tesla.com
13 Helen Trac (SBN 285824)
14 htrac@tesla.com
15 David Lee (SBN 264467)
16 dlee@tesla.com
17 **TESLA, INC.**
18 1501 Page Mill Building 6U
19 Palo Alto, CA 94304
20 Tel: (510) 298-8516

21 Additional counsel for Defendants Tesla, Inc. and Elon Musk

22 James W. Irej (SBN 150640)
23 jirej@yukelaw.com
24 Hassan Elrakabawy (SBN 248146)
25 helrakabawy@yukelaw.com
26 Celeste S. Del Rio (SBN 275969)
27 cdel_rio@yukelaw.com
28 **YUKEVICH CAVANAUGH**
355 South Grand Avenue, 15th Floor
Los Angeles, CA 90071
Tel: (213) 362-7777 / Fax: (213) 362-7788

Additional counsel for Plaintiff Alcon Entertainment, LLC

JOINT STIPULATION FOR DISMISSAL WITH PREJUDICE OF PLAINTIFF'S
THIRD AMENDED COMPLAINT AS AGAINST DEFENDANT WARNER
BROS. DISCOVERY, INC.

Plaintiff Alcon Entertainment, LLC ("Alcon" or "Plaintiff"), defendants Tesla, Inc. ("Tesla"), Elon Musk ("Musk"), and Warner Bros. Discovery, Inc. ("WBDI") stipulate and agree as follows:

1. Alcon and WBDI have reached a settlement.
2. Plaintiff's Third Amended Complaint ("TAC") (Dkt. No. 81) shall be dismissed with prejudice as to WBDI only, pursuant to Fed. R. Civ. Pro. 41(a)(1)(A)(ii).
3. To the extent Alcon's claims against WBDI in prior pleadings in the action were not dismissed with prejudice, such dismissals of Alcon's claims against WBDI in prior pleadings shall be deemed to be with prejudice as to WBDI.
4. As to each other, Alcon and WBDI shall bear their own fees and costs.
5. At the present time, Alcon, Tesla and Musk have not reached any settlement, and the Court shall not, at present, dismiss any of Alcon's, Tesla's or Musk's pleadings as against each other, which, *inter alia*, means that Alcon's claims in the TAC against Tesla and Musk are not stipulated to be dismissed, nor are Tesla's and Musk's general denials or affirmative defenses to Alcon's claims in the TAC.

[CONTINUED NEXT PAGE]

