

**Reviewed By: C. Roman on 3/24/2026 8:49 AM**

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11 *Attorneys for Plaintiff Apple Inc.*

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
 13 **FOR THE COUNTY OF SANTA CLARA**

14 APPLE INC., a California corporation,

15 Plaintiff,

16 v.

17 DI LIU, an individual,

18 Defendant.

Case No.: 25CV468940

**[PROPOSED] STIPULATION  
REGARDING DISMISSAL**

1 Plaintiff Apple Inc. (“Apple”) and Defendant Di Liu (“Mr. Liu”) stipulate as follows:

2 WHEREAS, Apple filed this action on June 24, 2025, in the above-captioned case,  
3 asserting a claim for breach of contract;

4 WHEREAS, on October 24, 2025, Apple agreed to Mr. Liu’s proposal to arbitrate Apple’s  
5 breach of contract claim pending before this Court as part of the ongoing arbitration between the  
6 Parties, and filed a Joint Stipulation and Proposed Order to temporarily stay the above-captioned  
7 case until that arbitration is completed;

8 WHEREAS, Mr. Liu acknowledges that the Confidentiality and Intellectual Property  
9 Agreement (“IPA”) obligates him to maintain the confidentiality of Apple’s confidential  
10 information; and

11 WHEREAS, Mr. Liu has reached an agreement with Apple to resolve this matter by  
12 returning Apple confidential information in his possession and making a payment to Apple for  
13 monetary damages.

14 NOW, THEREFORE, it is hereby STIPULATED by and between Apple and Mr. Liu  
15 (collectively, the “Parties” and each individually a “Party”) and hereby ORDERED that:

- 16 1. The claims in the above-captioned case are hereby DISMISSED with prejudice
- 17 pursuant to California Code of Civil Procedure Section 581(b)(2); and
- 18 2. Each party will bear its own costs, fees, and expenses related to this litigation,
- 19 including attorney fees.

20 PURSUANT TO STIPULATION, IT IS SO ORDERED this 25 day of March,  
21 2026.

22   
23 Judge Beth McGowen

24 ~~The Honorable Charles E. Adams~~

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Dated: 3/23/2026

Respectfully Submitted,

By: Joshua Lerner  
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1 Dated: 3/23/2026

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