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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

WERIDE CORP. f/k/a JingChi Corp.;  
WERIDE INC. f/k/a JingChi Inc.,

Plaintiff,

vs.

JING WANG, an individual, KUN HUANG,  
an individual, ZHONG ZHI XING  
TECHNOLOGY CO. LTD., d/b/a  
ALLRIDE.AI, ALLRIDE.AI INC., KAIZR,  
INC., ZKA INC., DOES 1-10

Defendants.

CASE NO. 5:18-cv-07233-EJD

**STIPULATION AND ~~PROPOSED~~  
ORDER DISMISSING ALL CLAIMS  
WITH PREJUDICE PURSUANT TO  
FEDERAL RULE OF CIVIL  
PROCEDURE 41(A)(2)**



- 1 5. Any bond posted by Plaintiffs with respect to either the Preliminary Injunctions mentioned
- 2 in paragraphs 3 and 4 above is hereby ordered released and dissolved effective
- 3 immediately.
- 4 6. The Parties hereby request, as it is a condition of their agreement to the dismissal, that the
- 5 Court exercise its discretion not to award further sanctions to WeRide, either pursuant to
- 6 the fees application filed at Docket Entry 490, or pursuant to the motion for sanctions that
- 7 WeRide filed at Docket Entry 376.
- 8 7. The Parties are duty bound to comply with the terms of the governing Protective Order
- 9 regarding the return and/or destruction of documents and certification of the same per the
- 10 terms of the governing Protective Order.
- 11 8. Each of the parties shall bear their own attorneys' fees and costs in this matter, and each
- 12 waives the right to appeal from any order entered in this matter.

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14 So stipulated and agreed.

<p>18 Respectfully submitted,</p> <p>19</p> <p>20 By: <u>/s/Claude M. Stern</u>          Claude M. Stern          QUINN EMANUEL          URQUHART &amp; SULLIVAN LLP          Attorneys for Plaintiffs WeRide          Corp. and WeRide Inc.</p> <p>23 Dated: May 8, 2020</p>	<p>18 Respectfully submitted,</p> <p>19</p> <p>20 By: <u>/s/Kurt A. Kappes</u>          Kurt A. Kappes          GREENBERG TRAUIG, LLP          Attorneys for Defendants AllRide.AI          Inc. and Zhong Zhi Xing Technology          Co. Ltd</p> <p>23 Dated: May 8, 2020</p>
<p>25 By: <u>/s/Gregory S. Gilchrist</u>          Gregory S. Gilchrist          KILPATRICK TOWNSEND &amp;          STOCKTON LLP          Attorneys for Defendants Jing          Wang And Kaizr, Inc</p> <p>28 Dated: May 8, 2020</p>	<p>25 By: <u>/s/Mortimer H. Hartwell</u>          Mortimer H. Hartwell          VINSON &amp; ELKINS LLP          Attorneys for Defendant Kun          Huang</p> <p>28 Dated: May 8, 2020</p>

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**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Claude M. Stern, Gregory S. Gilchrist and Mortimer H. Hartwell.

Dated: May 8, 2020

By: Michael D. Lane

1                    ~~Proposed~~ **Order Granting the Parties' Stipulation to Dismiss All Claims**

2                    The Court hereby GRANTS the Parties' stipulation and orders as follows:

- 3                    1. All claims alleged in the above captioned litigation by Plaintiffs WeRide Inc. and WeRide  
4                    Corp. against Defendants Jing Wang, Kun Huang, Zhong Zhi Xing Technology Co. Ltd.,  
5                    D/B/A AllRide.AI, AllRide.AI Inc., Kaizr, Inc., and ZKA Inc. are hereby dismissed **with**  
6                    **prejudice**.
- 7                    2. This Order shall have preclusive effect as to any counterclaims that Defendants Jing Wang,  
8                    Kun Huang, Zhong Zhi Xing Technology Co. Ltd., D/B/A AllRide.AI, AllRide.AI Inc.,  
9                    Kaizr, Inc., or ZKA Inc. could have brought in this litigation.
- 10                  3. The Court's Order Granting in Part and Denying in Part WeRide's Motion for Preliminary  
11                  Injunction dated March 22, 2019 and entered at Docket No.116, is hereby vacated.
- 12                  4. The Court's Order Granting in Part and Denying in Part Motion to Modify the Preliminary  
13                  Injunction dated October 28, 2019 and entered at Docket No. 342, is hereby vacated.
- 14                  5. The Court hereby exercises its discretion not to award further sanctions to WeRide, either  
15                  pursuant to the fees application filed at Docket Entry 490, or pursuant to the motion for  
16                  sanctions that WeRide filed at Docket Entry 376.
- 17                  6. Each of the parties shall bear their own attorneys' fees and costs in this matter, and each  
18                  waives the right to appeal from any order entered in this matter

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21 IT IS SO ORDERED.

22 DATED: May 8 \_\_\_\_\_, 2020

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25 The Honorable Edward J. Davila

26 UNITED STATES DISTRICT COURT JUDGE