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LBS Innovations, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ING BANK, FSB,

Plaintiff,

v.

LBS INNOVATIONS, LLC,

Defendants.

Civil Action No. 2:12-03809-KM-JAD

JURY TRIAL DEMANDED

Document Electronically Filed

JOINT MOTION FOR DISMISSAL

Plaintiff ING Bank, fsb (“ING”) and Defendant LBS Innovations, LLC (“LBSI”) pursuant to the Federal Rules of Civil Procedure 41(a)(2), hereby move for an order dismissing all claims and counterclaims in this action asserted between them without prejudice based on the terms of the settlement agreement entered into on September 11,

2012, between LBSI and Google, Inc. ("the Settlement Agreement"), each Party to bear its own costs, expenses and attorneys' fees.

Respectfully Submitted,

Dated: October 31, 2012

By: /s/ Sheila Raftery Wiggins
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a) on this 31st day of October, 2012. Any other counsel of record will be served by facsimile transmission and first class mail.

/s/ Sheila Raftery Wiggins