

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CORTEVA AGRISCIENCE LLC,	)	
PIONEER HI-BRED INTERNATIONAL,	)	
INC. and AGRIGENETICS, INC.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 23-1059 (JFM)
	)	
INARI AGRICULTURE, INC. and	)	
INARI AGRICULTURE NV,	)	
	)	
Defendants.	)	

STIPULATION AND [PROPOSED] ORDER OF DISMISSAL UNDER RULE 41(A)(2)

WHEREAS, Corteva Agriscience LLC, a Delaware limited liability company, Pioneer Hi-Bred International, Inc., a corporation organized and existing under the laws of the State of Iowa, and Agrigenetics, Inc., a Delaware corporation (collectively, “Corteva” or “Plaintiffs”), on the one hand and Inari Agriculture, Inc., a Delaware corporation (“Inari USA”), and Inari Agriculture NV, a company organized under the laws of the Kingdom of Belgium (“Inari Belgium” and together with Inari USA, “Inari” or “Defendants”), on the other hand (collectively, “the Parties”), jointly move for entry of the following STIPULATION AND ORDER OF DISMISSAL PURSUANT TO 41(a)(2);

WHEREAS, the Parties have reached a settlement of this action by executing a Confidential Settlement and Release Agreement on September 27, 2026 (“Agreement”), which shall become effective upon entry of this STIPULATION AND ORDER OF DISMISSAL;

WHEREAS, the definition and terms of the Agreement shall apply to any disputes between the parties regarding the enforcement of this Order, including selected definitions appended hereto as Appendix A, and other definitions are not restated here in full for reasons of convenience and confidentiality;

WHEREAS, Inari further agrees to destroy, or cause to be destroyed, all Corteva Biological Materials and Restricted Materials in the possession, custody, or control of Inari, its Affiliates, or any Third Party acting on Inari’s behalf, including all Corteva Germplasm, Corteva Events,

Derived Material, Derived Events, seeds, plants, plant parts, tissue cultures, DNA samples, biological materials, and derivatives thereof, as provided in the Agreement.

NOW THEREFORE based on the Parties' Stipulation and the Parties' Agreement, IT IS HEREBY ORDERED:

1. The Parties' STIPULATION AND ORDER OF DISMISSAL pursuant to Federal Rule of Civil Procedure 41(a)(2) is GRANTED.
2. Within thirty (30) days after the entry of this Order, Inari shall destroy, or cause to be destroyed, all Corteva Biological Materials and Restricted Materials in the possession, custody, or control of Inari, its Affiliates, or any Third Party acting on Inari's behalf, including all Corteva Germplasm, Corteva Events, Derived Material, Derived Events, seeds, plants, plant parts, tissue cultures, DNA samples, biological materials, and derivatives thereof, as provided in the Agreement.
3. Inari shall provide to Corteva within forty-five (45) days after entry of this Order a declaration under penalty of perjury, in compliance with 28 U.S.C. § 1746, signed by an authorized officer of each of Inari USA and Inari Belgium, confirming that all such Corteva Biological Materials have been destroyed, as provided above.
4. The Court shall retain jurisdiction to enforce the Agreement and the terms of this Order.
5. Subject to the Court's retained jurisdiction as provided in paragraph 4 above, all claims, counterclaims, cross-claims, defenses, and affirmative defenses asserted in the case are hereby dismissed with prejudice.
6. Each Party shall bear its own litigation expenses, including all attorneys' fees, expert fees, costs, and expenses incurred in connection with this case.

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September 27, 2026

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SO ORDERED this _____ day of _____ 2026.

UNITED STATES DISTRICT JUDGE