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11	Plaintiffs' Interim Co-Lead Counsel	
12 13	[Additional Counsel listed on Signature Page]	
14	UNITED STATES DISTRICT COURT	
15		
16	NORTHERN DISTRICT OF CALIFORNIA	
	SAN FRANCISCO DIVISION	
17		
18	IN RE	No. 3-13-cv-3072-EMC
19 20	MYFORD TOUCH CONSUMER LITIGATION	STIPULATION AND [PROPOSED] ORDER OF VOLUNTARY
20 21		DISMISSAL PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(ii)
22		Date: February 5, 2015
23		Hon. Edward M. Chen
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28	STIPULATION AND [PROPOSED] ORDER OF VOLUNTARY DISMISSAL - 1 Case No.: 13-cv-3072-EMC 010388-11 757244 V1	

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## **STIPULATION**

IT IS HEREBY STIPULATED AND AGREED, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), that the remaining causes of action asserted in the First Amended Class Action Complaint (ECF No. 47) by Plaintiffs Art Avedisian, Angela Battle, Grif Rosser, and Jason Zuchowski (the "Dismissed Plaintiffs") against Defendant Ford Motor Company are DISMISSED WITH PREJUDICE.

The parties further stipulate and agree that such dismissal shall not prevent the Dismissed Plaintiffs from participating in any recovery or other remedies to which they would otherwise be entitled by virtue of their qualification for membership in any class or subclass certified by the Court in this litigation. For the avoidance of doubt, the parties expressly agree that this dismissal shall not affect the Dismissed Plaintiffs' ability to submit claims in connection with any claims administration procedure approved by the Court in this litigation for which they would otherwise be eligible.

In agreeing to this stipulation, Defendant expressly reserves its right to seek depositions of the Dismissed Plaintiffs and to seek payment of costs reasonably incurred in preparing its defense to the Dismissed Plaintiffs' claims. The Dismissed Plaintiffs likewise reserve their rights to oppose and object to any request for deposition of the Dismissed Plaintiffs, and/or for payment of costs, and/or any other relief, made by Defendant.

DATED: February 5, 2015

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## HAGENS BERMAN SOBOL SHAPIRO LLP

By: <u>/s/ Steve W. Berman</u> Steve W. Berman (pro hac vice)

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1		
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10		Jconigliaro@Dykema.com
11		Attorneys for Defendant
12		FORD MOTOR COMPANY
13	[PROPOSED] ORDER	
14	Pursuant to stipulation, it is SO	ORDERED.
15	DATED:, 2015	
16		Honorable Edward M. Chen
		United States District Judge
17		United States District Judge
17 18		United States District Judge
		United States District Judge
18		United States District Judge
18 19		United States District Judge
18 19 20		United States District Judge
18 19 20 21		United States District Judge
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol>		United States District Judge
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>		United States District Judge
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>		United States District Judge
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ol>		United States District Judge

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1	<b>ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)</b>	
2	I, Steve W. Berman, am the ECF User whose identification and password are being used to	
3	file the foregoing document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all	
4	signatories have concurred in this filing.	
5	Dated: February 5, 2015	
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7	<u>/s/ Steve W. Berman</u> Steve W. Berman	
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28	STIPULATION AND [PROPOSED] ORDER OF VOLUNTARY DISMISSAL - 4 Case No.: 13-cv-3072-EMC 010388-11 757244 VI	

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1			
2	CERTIFICATE OF SERVICE		
3	I hereby certify the on February 5, 2015, I electronically filed the foregoing document using		
4	the CM/ECF system which will send notification of such filing to the email addresses registered in		
5	the CM/ECF system.		
6	Details Echanom 5, 2015		
7	Dated: February 5, 2015		
8	<u>/s/ Steve W. Berman</u> Steve W. Berman		
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28	STIPULATION AND [PROPOSED] ORDER OF VOLUNTARY DISMISSAL - 5 Case No.: 13-cv-3072-EMC 010388-11 757244 V1		