

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

ROLLIE BUCHANAN, *et al.*, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

VOLVO CAR USA, LLC, *et al.*,

Defendants.

Case No. 2:22-cv-02227-KM-JSA

**STIPULATION OF VOLUNTARY
DISMISSAL PURSUANT TO FED. R.
CIV. PROC. 41(a)(1)(A)(II)**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs Rollie Buchanan, Davin Card, Kim Ferguson, Fred Martin Ferguson, Kevin Flynn, Philippe Geyskens, Robert Hoffman, Eric And Mariela Kotoun, Arthur Krichevsky, Elsie Saks, Steven Salhanick, Mark Silber, Robert Tubbe, Toni Tubbe, and Donna Urben (“Plaintiffs”), and Defendants Volvo Car USA, LLC, Volvo Cars of North America, LLC, and Volvo Personvagnar AB (“Defendants”) hereby stipulate, subject to the approval of the Court, to the dismissal of all Plaintiffs’ individual claims with prejudice, and without prejudice as to the claims on behalf of the proposed class, with each party to bear its own costs, interests, and attorneys’ fees.

Dated: May 22, 2023

/s/Russell D. Paul

Russell D. Paul (NJ 037411989)
Abigail J. Gertner (NJ 019632003)
Natalie Lesser (NJ 017882010)
Amey J. Park (NJ 070422014)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Telephone: (215) 875-3000
Fax: (215) 875-4604
rpaul@bm.net
agertner@bm.net
nlesser@bm.net
apark@bm.net

/s/Michael L. Mallow

Michael L. Mallow (NJ 037931991)
Rachel. A. Straus (*pro hac vice*)
SHOOK, HARDY & BACON L.L.P. 2049
Century Park East, Suite 3000
Los Angeles, CA 90067
Telephone: (424) 285-8330
Fax: (424) 204-9093
mmallow@shb.com
rstrauss@shb.com

***Counsel for Defendants Volvo Car USA LLC,
Volvo Cars of North America, LLC, and
Volvo Personvagnar AB, et al.***

Tarek H. Zohdy (*pro hac vice*)
Cody R. Padgett (*pro hac vice*)
Laura E. Goolsby (*pro hac vice*)
CAPSTONE LAW APC
1875 Century Park East, Suite 1000
Los Angeles, California 90067
Tel.: (310) 556-4811
Fax: (310) 943-0396
Tarek.Zohdy@capstonelawyers.com
Cody.Padgett@capstonelawyers.com
Laura.Goolsby@capstonelawyers.com

***Counsel for Plaintiffs and the Proposed
Classes***

SO ORDERED this _____ day of _____, 2023.

The Honorable Jessica S. Allen
UNITED STATES DISTRICT JUDGE