

1 **BARNES & THORNBURG LLP**
Andrew J. Galvin (CA Bar No. 261925)
2 *andrew.galvin@btlaw.com*
655 West Broadway, Suite 1300
3 San Diego, CA 92101
Telephone: (619) 321-5008
4 Facsimile: (310) 284-3894

5 *Attorneys for Defendant,*
Whirlpool Corporation
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8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 **KIMBERLY CHEBEGIA, and**
11 **KRISTOPHER SPEAR, individually and**
on behalf of all others similarly situated,

12 **Plaintiffs,**

13 **v.**

14 **WHIRLPOOL CORPORATION, a**
15 **Delaware corporation; DOES 1 through 50,**
inclusive;

16 **Defendant.**

Case No. 20-cv-2217-BEN-JBL

**JOINT MOTION FOR DISMISSAL
OF COMPLAINT PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 41**

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18 Pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, Plaintiffs
19 Kimberly Chebegia and Kristopher Spear, individually and on behalf of all others
20 similarly situated (“Plaintiffs”), and Defendant Whirlpool Corporation (collectively
21 “the Parties”), respectfully file this Joint Motion for Dismissal of the Complaint.
22 The request for dismissal is based on the Parties’ settlement of this matter, which
23 resolves all disputes between the Parties.

24 Accordingly, the Parties hereby jointly move this Court for an order
25 dismissing Plaintiffs’ individual claims with prejudice and Plaintiffs’ claims on

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behalf of all others similarly situated without prejudice, with each party to bear its own attorneys’ fees and costs.

Respectfully submitted,

Dated: July 28, 2022

BARNES & THORNBURG LLP

/s/ Andrew J. Galvin

Andrew J. Galvin
*Attorneys for Defendant,
Whirlpool Corporation*

Dated: July 28, 2022

KEEGAN & BAKER, LLP

/s/ Patrick N. Keegan

Patrick N. Keegan
*Attorneys for Plaintiffs
Kimberly Chebegia and Kristopher
Spear, and others similarly situated*

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SIGNATURE CERTIFICATION

I hereby certify that the content of this document is acceptable to counsel for Plaintiffs KIMBERLY CHEBEGIA and KRISTOPHER SPEAR, individually and on behalf of all others similarly situated, and that I have obtained such counsel’s authorization to affix his electronic signature to this document.

Dated: July 28, 2022

/s/ Andrew J. Galvin
Andrew J. Galvin