

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JOHN COLLIER, KRYSTA RENFRO,
individually, and on behalf of a class of similarly
situated individuals,

Plaintiffs,

v.

FORD MOTOR COMPANY, a Delaware
corporation,

Defendant.

NO. 3:23-cv-05778-BHS

**PLAINTIFF JOHN COLLIER AND
KRYSTA RENFRO'S RULE 41
NOTICE OF VOLUNTARY
DISMISSAL WITHOUT
PREJUDICE**

TO THE COURT AND ALL PARTIES AND COUNSEL OF RECORD:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiffs John Collier and Krysta Renfro (“Plaintiffs”) hereby voluntarily dismiss their individual claims and this action **without prejudice** as to Plaintiffs’ individual claims, and without prejudice as to the claims of the putative class members. Each side to bear their own costs.

1 DATED this 17th day of March, 2025.

2 TOUSLEY BRAIN STEPHENS PLLC

3 By: s/ Jason T. Dennett

4 Jason T. Dennett, WSBA #30686
5 Cecily C. Jordan, WSBA #50061
6 Kaleigh N. Boyd, WSBA #52684
7 1200 5th Avenue, Suite 1700
8 Seattle, WA 98101
9 Telephone: 206.682.5600
10 jdennett@tousley.com
11 cjordan@tousley.com
12 kboyd@tousley.com

13 Russell D. Paul *
14 Abigail J. Gertner *
15 Amey J. Park **
16 BERGER MONTAGUE PC
17 1818 Market Street, Suite 3600
18 Philadelphia, PA 19103
19 Telephone: 215.875.3000
20 rpaul@bm.net
21 agertner@bm.net
22 apark@bm.net

23 Ketan A. Patel *
24 CORPUS LAW PATEL, LLC
25 P.O. Box 724713
26 Atlanta, Georgia 31139
678.597.8020
kp@corpus-law.com

Tarek H. Zohdy *
Cody R. Padgett *
Laura E. Goolsby *
Majdi Hijazin *
Abigail Gertner *
CAPSTONE LAW, APC
1875 Century Park East, Suite 1000
Los Angeles, CA 90067
Telephone: 310.556.4811
Tarek.Zohdy@Capstonelawyers.com
Cody.Padgett@Capstonelawyers.com
Laura.Goolsby@Capstonelawyers.com
Majdi.Hijazin@Capstonelawyers.com
Abigail.Gertner@Capstonelawyers.com

Jonathan D. Selbin **
Jason L. Lichtman *
Muriel Kenfield-Kelleher *
LIEFF CABRASER HEIMANN

1 & BERNSTEIN, LLP
2 250 Hudson Street, 8th Floor
3 New York, NY 10013-1413
4 Telephone: 212.355.9500
5 jselbin@lchb.com
6 jlichtman@lchb.com
7 mkenfieldkelleher@lchb.com

8 E. Powell Miller*
9 Dennis A. Lienhardt*
10 THE MILLER LAW FIRM PC
11 950 W. University Dr., Ste. 300
12 Rochester, MI 48307
13 Telephone: 248.841.2200
14 epm@millerlawpc.com
15 ssa@millerlawpc.com

16 Stephen R. Basser*
17 Samuel M. Ward*
18 BARRACK, RODOS, & BACINE
19 600 W Broadway, Suite 900
20 San Diego, CA 92101
21 Telephone: 619.230.0800
22 sbasser@barrack.com
23 sward@barrack.com

24 John G. Emerson**
25 EMERSON FIRM, PLLC
26 2500 Wilcrest, Suite 300
Houston, TX 77042
jemerson@emersonfirm.com
Telephone: 800.551.8649

* admitted pro hac vice
** pro hac vice forthcoming

***Attorneys for Plaintiffs and the Proposed
Classes***