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Counsel for Plaintiffs*

18 **UNITED STATES DISTRICT COURT**
19 **CENTRAL DISTRICT OF CALIFORNIA**

21 In re: KIA HYUNDAI VEHICLE
22 THEFT MARKETING, SALES
PRACTICES, AND PRODUCTS
23 LIABILITY LITIGATION

Case No. 8:22-ML-3052-JVS(KESx)

The Honorable James V. Selna

25 **JOINT STATEMENT AND**
STIPULATION OF SETTLEMENT

26 This document relates to:
27 CONSUMER CLASS ACTION

[PROPOSED] ORDER

1 The Consumer Plaintiffs and Defendants are pleased to inform the Court that
2 they have reached a settlement-in-principle of the consumer class action claims. This
3 agreement follows months of negotiations, including multiple mediation sessions with
4 the Court-appointed Mediator, Hon. Margaret M. Morrow (ret.), of Judicate West. The
5 settling parties are in the process of documenting the agreement. The Consumer
6 Plaintiffs intend to move for preliminary approval by July 10, 2023.

7 In light of the proposed settlement, Defendants and the Consumer Plaintiffs
8 stipulate that further briefing on Defendants’ motion to dismiss (Dkt. 95) be stayed, as
9 well as any other deadlines involving the consumer cases unrelated to settlement
10 approval.

11
12 Dated: May 18, 2023

13 By: /s/ Steve W. Berman
14 Steve W. Berman, Esq.
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By: /s/ Shon Morgan
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[PROPOSED] ORDER

FOR GOOD CAUSE SHOWN, IT IS SO ORDERED. Briefing on Defendants’ motion to dismiss (Dkt. 95) and all other deadlines in all consumer cases unrelated to settlement approval are stayed. The Consumer Plaintiffs will move for preliminary approval by July 10, 2023.

DATED: _____, 2023

Honorable James V. Selna
United States District Judge

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FILER’S ATTESTATION

Pursuant to C.D. Cal. L.R. 5-4.3.4(a)(2)(i), I, Shon Morgan, attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing’s content and have authorized the filing.

/s/ Shon Morgan
Shon Morgan