

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA**

GEORGE JONES, individually and on behalf of all others similarly situated,)	
)	Case No. 4:21-cv-00148-JAJ-SHL
)	
Plaintiff,)	PLAINTIFF’S NOTICE OF
)	VOLUNTARY DISMISSAL
)	WITHOUT PREJUDICE
)	
v.)	
)	
AMERICAN HONDA MOTOR CO., INC., a corporation,)	
)	
Defendant.)	

PLEASE TAKE NOTICE that, pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiff George Jones voluntarily dismisses all causes of action in the complaint (ECF No. 1) without prejudice. Defendant American Honda Motor Co., Inc. has not filed an answer to the complaint or a motion for summary judgment. Dismissal without prejudice under Rule 41(a)(1)(A)(i) is therefore appropriate.¹

Dated: August 13, 2021

Respectfully submitted,

By: /s/ Jonathan D. Lindenfeld
Jonathan D. Lindenfeld (*pro hac vice*)
FEGAN SCOTT LLC
140 Broadway, 46th Floor
New York, NY 10005
Ph.: 332.216.2101
Fax: 312.264.0100
Email: jonathan@feganscott.com

¹ Court approval under Fed. R. Civ. P. 23(e)(1) is not necessary because no class has been certified. Even though Defendant has appeared in this action, consent of Defendant is not necessary because Defendant has not answered the Complaint. *See* Fed. R. Civ. P. 41(a)(1)(A)(i). Nevertheless, Defendant is aware that Plaintiff is voluntarily dismissing this case without prejudice so that he may proceed with this matter in the United States District Court for the Northern District of California (where other substantially identical actions against Defendant will be litigated), whereby Plaintiff can more efficiently litigate this matter in coordination with said cases in the same federal district.

Elizabeth A. Fegan (*pro hac vice*)
FEGAN SCOTT LLC
150 S. Wacker Dr., 24th Floor
Chicago, IL 60606
Ph: 312.741.1019
Fax: 312.264.0100
Email: beth@feganscott.com

J. Barton Goplerud
SHINDLER, ANDERSON, GOPLERUD &
WEESE, PC
5015 Grand Ridge Drive, Suite 100
West Des Moines, Iowa 50265
Ph: (515) 223-4567
Fax: (515) 223-8887
Email: goplerud@sagwlaw.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2021, I electronically filed the foregoing using the Court's electronic filing system, which will notify all counsel of record authorized to receive such filings.

/s/ Jonathan D. Lindenfeld

Jonathan D. Lindenfeld

FEGAN SCOTT LLC

140 Broadway, 46th Floor

New York, NY 10005

Phone: 332.216.2101

Fax: 312.264.0100

jonathan@feganscott.com