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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VIRGINIA M. LAMBRIX, *et al.*,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

TESLA, INC.,

Defendant.

Case No. 3:23-cv-1145-TLT (Lead Case)
Case No. 3:23-cv-1496-TLT
Case No. 3:23-cv-1543-TLT
Case No. 3:23-cv-2035-TLT
Case No. 3:23-cv-2352-TLT

**STIPULATED MOTION TO
VOLUNTARILY DISMISS WITH
PREJUDICE**

Judge: Honorable Trina L. Thompson

Pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiffs Virginia M. Lambrix, Sean Bose, Anthony Adjuder, Patrick Doyle, Philomena Nana-Anyangwe, Jason Pratti, Adriana Ferreira, Cary Phillips, Levi Stoffal, Danielle Thys, Andrew Ragone, and Connor Shore (collectively, “Plaintiffs”) and Defendant Tesla, Inc. (“Tesla”) hereby move this Court for an order voluntarily dismissing the above-captioned case, and all cases that were consolidated with it, with prejudice, but without costs and attorneys’ fees to either party.

STIPULATED MOTION TO VOLUNTARILY DISMISS WITH PREJUDICE
Case No. 3:23-CV-1145-TLT (Lead Case)

Dated: 6/5/2025

/s/ Matthew W. Ruan

Matthew W. Ruan
FREED KANNER LONDON & MILLEN LLC
*Counsel for Plaintiffs and Interim Lead Class Counsel for
 the Proposed Class*

R. Alexander Saveri
SAVERI & SAVERI, INC.
*Counsel for Plaintiffs and Interim Liaison Counsel for the
 Proposed Class*

Dated: 5/27/2025

/s/ David Gringer

David Gringer
 Ari Holtzblatt
 Andres Salinas
 Allison Bingxue Que
**WILMER CUTLER PICKERING HALE AND
 DORR LLP**

Christopher C. Wheeler
FARELLA BRAUN + MARTEL LLP
Counsel for Defendant Tesla, Inc.

E-FILING ATTESTATION

I, R. Alexander Saveri, attest that each of the Signatories has concurred in the filing of this document in accordance with Civil Local Rule 5-1(i)(3).

/s/ R. Alexander Saveri