

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

MATTHEW MAY, OMAR OWEIS,  
MARCOS PIERAS, and LINDA  
CHRISTIAN, individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

VOLKSWAGEN GROUP OF  
AMERICA, INC., a New Jersey  
corporation, d/b/a AUDI OF AMERICA,  
INC., AUDI AG, a German corporation  
and VOLKSWAGEN AG, a German  
corporation,

Defendants.

Case No. 2:20-cv-09708-JXN-MAH

Stipulation and Proposed Order of  
Voluntary Dismissal Without  
Prejudice Pursuant to FRCP  
41(a)(1)(A)(ii)

Pursuant to FRCP 41(a)(1)(A)(ii), plaintiffs Matthew May, Omar Oweis, Marcos Pieras, and Linda Christian (“Plaintiffs”) and Defendant Volkswagen Group of America, Inc., (“VWGoA”) d/b/a Audi of America, Inc., through their respective counsel of record, hereby stipulate and agree to dismiss this action without prejudice. With this stipulation, no parties or claims remain in this case.<sup>1</sup>

Dated: November 1, 2023

/s/ Russell D. Paul

Russell D. Paul (037411989)

Amey J. Park (070422014)

Abigail J. Gertner (019632003)

**BERGER MONTAGUE PC**

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<sup>1</sup> Defendants Audi AG and Volkswagen AG were not served with the Complaint and no counsel has entered an appearance on their behalf.

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*Attorneys for Plaintiffs and the Proposed Classes*

Dated: November 1, 2023

/s/ Homer B. Ramsey  
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*Attorneys for Volkswagen Group of America,  
Inc.*

SO ORDERED:

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Julien Xavier Neals  
United States District Judge