1 Robert R. Ahdoot (SBN 172098) radoot@ahdootwolfson.com 2 AHDOOT & WOLFSON, PC 3 10728 Lindbrook Drive Los Angeles, California 09924 4 Tel: (310) 474-9111 / Fax: (310) 474-8585 5 Timothy P. Kingsbury (pro hac vice) 6 tkingsbury@mcgpc.com 7 MCGUIRE LAW, P.C. 55 W. Wacker Dr., 9th Fl. 8 Chicago, IL 60601 9 Tel: (312) 893-7002 Fax: (312) 275-7895 10 11 Counsel for Plaintiff Kevin Sanders and the Putative Class 12 13 14 UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA 15 KEVIN SANDERS, individually 16 Case No. 8:19-cv-01365-JVS-KES and on behalf of similarly situated 17 individuals, Hon. James V. Selna Magistrate Judge Karen E. Scott 18 Plaintiff, 19 **JOINT STIPULATION OF** DISMISSAL 20 V. 21 FCA US LLC, 22 Defendant. 23 24 25 26 27 28

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff Kevin Sanders ("Plaintiff") and Defendant FCA US LLC ("FCA US") (together "the Parties"), through their respective counsel of record, hereby STIPULATE and AGREE as follows:

- 1. Plaintiff stipulates and agrees to the voluntary dismissal of all of his claims with prejudice, and to the voluntarily dismissal of the putative class members' claims without prejudice;
- 2. The Parties stipulate and agree that Plaintiff and FCA US shall each bear their own fees and costs incurred in this matter.

IT IS SO STIPULATED.

Pursuant to Local Rule 5-4.3.4, Timothy P. Kingsbury hereby attests that all of the other signatories listed below concur in this filing's content and have authorized the filing.

Dated: August 27, 2020 By: /s/ Timothy P. Kingsbury

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Tel: (312) 893-7002 / Fax: (312) 275-7895 1 2 Counsel for Plaintiff Kevin Sanders 3 Dated: August 27, 2020 By: /s/ Ryan E. Cosgrove Ryan E. Cosgrove, Bar No. 277907 4 ryan.cosgrove@nelsonmullins.com 5 NELSON MULLINS RILEY 6 & SCARBOROUGH LLP 19191 South Vermont Avenue, Suite 900 7 Torrance, California 90502 8 Tel: (424) 221-7400 / Fax: (424) 221-7499 9 Kathy A. Wisniewski (admitted *pro hac vice*) 10 kwisniewski@thompsoncoburn.com Stephen A. D'Aunoy (admitted pro hac vice) 11 sdaunoy@thompsoncoburn.com 12 Thomas L. Azar, Jr. (admitted pro hac vice) tazar@thompsoncoburn.com 13 THOMPSON COBURN LLP 14 One U.S. Bank Plaza St. Louis, Missouri 63101 15 Tel: (314) 552-6000 / Fax: (314) 552-7000 16 Counsel for Defendant FCA US LLC 17 18 **CERTIFICATE OF SERVICE** 19 I hereby certify that on August 27, 2020, I electronically filed the foregoing 20 document using the CM/ECF system which will send notification of such filing to 21 the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic 22 Mail Notice List. 23 By: /s/ Timothy P. Kingsbury 24 25 26 27 28