

JS-6

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA

3  
4 AMY N. NGUYEN, an individual,  
5 Plaintiff,

6 v.

7 VOLKSWAGEN GROUP OF  
8 AMERICA, INC, and DOES 1  
through 10, inclusive,  
9 Defendants.

Case No. 2:23-cv-04104-HDV-JC

*Assigned for all purposes to the Hon.  
Hernán D. Vera in Dept. 5B*

**[PROPOSED] JUDGMENT PURSUANT  
TO FEDERAL RULE OF CIVIL  
PROCEDURE 68**

Action Filed: April 19, 2023  
Trial Date: October 15, 2024

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14 **TO THE COURT, ALL PARTIES, AND TO THEIR ATTORNEYS OF  
15 RECORD:**

16 Plaintiff Amy N. Nguyen (“Plaintiff”), submits the following Proposed  
17 Judgment, following Defendant Volkswagen Group of America, Inc.’s (“Defendant”)  
18 acceptance of Plaintiff’s Offer of Judgment pursuant to Rule 68 of the Federal Rules  
19 of Civil Procedure:

20 1. Defendant will pay Plaintiff \$65,212.85 to resolve Plaintiff’s claims related  
21 to the purchase, servicing, and warranties of the 2019 Audi E-Tron, VIN  
22 WA1VABGE3KB016016 in this action.

23 2. Defendant will also pay Plaintiff’s attorney’s fees, expenses, and costs  
24 pursuant to California Civil Code §1794(d) in an amount to be determined by the Court  
25 via a single noticed motion. Defendant agrees that Plaintiff is the prevailing party in  
26 this action. Defendant shall pay the attorneys’ fees and cost amounts determined by the  
27 Court within 30 days’ notice of the Court’s ruling on same.

28 3. Apart from the amounts set forth above, each side agrees to bear its own

1 attorney's fees and costs.

2 4. The amount set forth in Paragraph 1 shall be paid to Plaintiff within thirty  
3 ("30") days of acceptance of this offer of judgment.

4 5. Plaintiff will stipulate to dismiss the Complaint with prejudice within 5  
5 business days after receiving all payments from Defendant due to Plaintiff and her  
6 counsel.

7 6. The parties hereby stipulate that the Court shall retain jurisdiction to enforce  
8 this offer of judgment.

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12 Dated: 8/29/24

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14 *Honorable Judge Hernán D. Vera*  
15 Judge for the Central District of California  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 28, 2024, I filed the foregoing document entitled **[PROPOSED] JUDGMENT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 68** with the clerk of court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record in this action.

/s/ Jasmine Aragon

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Jasmine Aragon