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12 *[Additional Counsel listed on*
 13 *Signature Page]*

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION

18 IN RE
 19 MYFORD TOUCH CONSUMER
 20 LITIGATION

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No. 3-13-cv-3072-EMC

**STIPULATION AND [PROPOSED]
 ORDER OF VOLUNTARY
 DISMISSAL PURSUANT TO FED. R.
 CIV. P. 41(a)(1)(A)(ii)**

Date: February 5, 2015

Hon. Edward M. Chen

STIPULATION

IT IS HEREBY STIPULATED AND AGREED, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), that the remaining causes of action asserted in the First Amended Class Action Complaint (ECF No. 47) by Plaintiffs Art Avedisian, Angela Battle, Grif Rosser, and Jason Zuchowski (the "Dismissed Plaintiffs") against Defendant Ford Motor Company are DISMISSED WITH PREJUDICE.

The parties further stipulate and agree that such dismissal shall not prevent the Dismissed Plaintiffs from participating in any recovery or other remedies to which they would otherwise be entitled by virtue of their qualification for membership in any class or subclass certified by the Court in this litigation. For the avoidance of doubt, the parties expressly agree that this dismissal shall not affect the Dismissed Plaintiffs' ability to submit claims in connection with any claims administration procedure approved by the Court in this litigation for which they would otherwise be eligible.

In agreeing to this stipulation, Defendant expressly reserves its right to seek depositions of the Dismissed Plaintiffs and to seek payment of costs reasonably incurred in preparing its defense to the Dismissed Plaintiffs' claims. The Dismissed Plaintiffs likewise reserve their rights to oppose and object to any request for deposition of the Dismissed Plaintiffs, and/or for payment of costs, and/or any other relief, made by Defendant.

DATED: February 5, 2015

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Steve W. Berman
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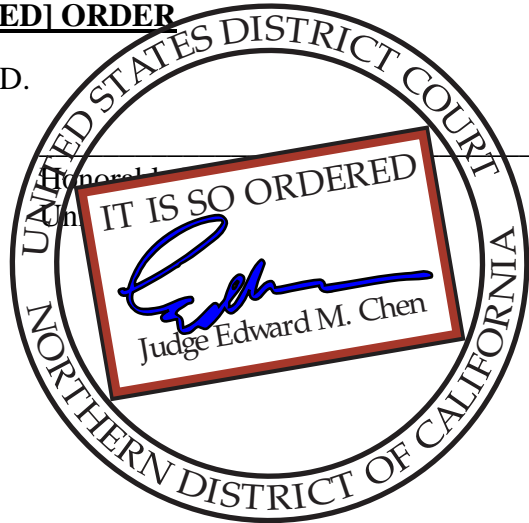
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Attorneys for Defendant
FORD MOTOR COMPANY

~~[PROPOSED]~~ ORDER

Pursuant to stipulation, it is SO ORDERED.

DATED: 2/6, 2015



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ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)

I, Steve W. Berman, am the ECF User whose identification and password are being used to file the foregoing document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories have concurred in this filing.

Dated: February 5, 2015

/s/ Steve W. Berman
Steve W. Berman

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on February 5, 2015, I electronically filed the foregoing document using
3 the CM/ECF system which will send notification of such filing to the email addresses registered in
4 the CM/ECF system.
5

6 Dated: February 5, 2015

7 */s/ Steve W. Berman*
8 Steve W. Berman

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