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*Attorneys for Defendant
 Volkswagen Group of America, Inc.*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

RHONDA BRADBURN,

Plaintiff,

v.

VOLKSWAGEN GROUP OF AMERICA,
 INC.; and DOES ONE through TEN,

Defendants.

Case No. 3:16-CV-04369-CRB

**STIPULATION TO
 REMAND**

1 Plaintiff Rhonda Bradburn ("Plaintiff") and Defendant Volkswagen
2 Group of America, Inc. ("VWGoA") by and through their respective counsel,
3 hereby stipulate as follows:

4 WHEREAS, on June 13, 2016, Plaintiff filed the original Complaint
5 in Sacramento County Superior Court. Plaintiff's claims arose from alleged
6 defects with sunroof, fuel system, transmission, engine, battery and emissions
7 system in the vehicle purchased by Plaintiff. The Complaint alleged that VWGoA
8 failed to repair the vehicle or to make it conform with its warranties or
9 representations concerning the vehicle;

10 WHEREAS, on or about July 14, 2016, Defendants removed the case
11 to the United States District Court for the Eastern District of California;

12 WHEREAS, on or about August 2, 2016, this action was transferred
13 to the federal multidistrict litigation pending in front of Judge Charles Breyer in the
14 United States District Court for the Northern District of California in In re:
15 Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability
16 Litigation, Case No. 3:15-md-02672-CRB (MDL No. 2672) ("the MDL");

17 WHEREAS, Plaintiff has agreed, upon remand, to dismiss all
18 emissions-related causes of action and not to further amend his complaint to add
19 any emissions-related causes of action;

20 WHEREAS, in light of the above agreement, the parties now agree
21 that this action should be remanded to Sacramento Superior Court for further
22 adjudication;

23 NOW, THEREFORE, IT IS HEREBY STIPULATED AND
24 AGREED, by and between counsel for Plaintiff and counsel for Defendant, that the
25 Bradburn action should be remanded immediately to Sacramento Superior Court.

26 Pursuant to Local Rule 5-1(i)(3), I, Laura K. Oswell, attest that all
27 other signatories listed, and on whose behalf this filing is submitted, concur in the
28 filing's content and have authorized the filing.

1
2 Dated: October 12, 2016

3 /s/ Laura K. Oswell
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13 *Volkswagen Group of America, Inc.*

14
15 Dated: October 12, 2016

16 /s/ Ryan Gomez
17 Jon P. Jacobs (SBN 205245)
18 Ryan H. Gomez (SBN 305208)
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20 *Attorneys for Plaintiff*
21 *Rhonda Bradburn*

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23
24
25 November 3, 2016

