

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JOHN COLLIER, KRYSTA RENFRO, ALEX
SAMUELS, BRADLEY CARICOFÉ, SHAWN
THIBODEAUX, JULIE THIBODEAUX,
CATHY CARROLL, LAZARO GOMEZ,
KENNEITH HUNNEL, LEANNE HUNNEL,
and JAMES KOHEN, individually, and on
behalf of a class of similarly situated individuals,

Plaintiffs,

v.

FORD MOTOR COMPANY, a Delaware
corporation,

Defendant.

NO. 3:23-cv-05778-BHS

**STIPULATION FOR DISMISSAL
WITHOUT PREJUDICE OF ALEX
SAMUELS, BRADLEY CARICOFÉ,
SHAWN THIBODEAUX, JULIE
THIBODEAUX, CATHY CARROLL,
LAZARO GOMEZ, KENNEITH
HUNNEL, LEANNE HUNNEL, AND
JAMES KOHEN**

STIPULATION

Plaintiffs Alex Samuels, Bradley Caricofe, Shawn Thibodeaux, Julie Thibodeaux,
Cathy Carroll, Lazaro Gomez, Kenneith Hunnel, Leanne Hunnel, and James Kohen and
Defendant Ford Motor Company hereby stipulate as follows:

1. Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure,
Plaintiffs Alex Samuels, Bradley Caricofe, Shawn Thibodeaux, Julie Thibodeaux, Cathy
Carroll, Lazaro Gomez, Kenneith Hunnel, Leanne Hunnel, and James Kohen stipulate to

1 dismissal of their claims in this action without prejudice, with each side to bear its own fees and
2 costs.

3 2. The parties to this stipulation agree that the statute of limitations on the claims
4 brought against Ford Motor Company by Alex Samuels, Bradley Caricofe, Shawn Thibodeaux,
5 Julie Thibodeaux, Cathy Carroll, Lazaro Gomez, Kenneith Hunnel, Leanne Hunnel, and James
6 Kohen, as alleged in the First Amended Complaint (Dkt. No. 23), are tolled for a period of
7 sixty (60) days from the date of this stipulation, without release, waiver or prejudice of any
8 kind.

9 3. This stipulated dismissal shall not operate as a notice of dismissal for purposes
10 of Rule 41(a)(1)(B).

11
12 STIPULATED AND AGREED this 12th day of March, 2024.

13
14 SHOOK HARDY & BACON LLP

15 By: s/ Amir Nassihi
16 Amir Nassihi, *admitted pro hac vice*
17 555 MISSION ST STE 2300
18 SAN FRANCISCO, CA 94105
19 415-544-1900
20 Fax: 415-391-0281
21 Email: anassihi@shb.com

22 SHOOK HARDY & BACON LLP
23 Steven Rich, WSBA #48444
24 701 5TH AVE STE 6800
25 SEATTLE, WA 98104
26 206-344-7620
Email: srich@shb.com

Attorneys for Defendant

TOUSLEY BRAIN STEPHENS PLLC

By: s/ Jason T Dennett
Jason T. Dennett, WSBA #30686
jdennett@tousley.com
By: s/ Cecily C. Jordan
Cecily C. Jordan, WSBA #50061
cjordan@tousley.com
Kaleigh N. Boyd, WSBA #52684
kboyd@tousley.com

1200 5th Avenue, Suite 1700
Seattle, WA 98101
206.682.5600
206.682.2992

By: s/ Jason L. Lichtman
Jonathan D. Selbin **
Jason L. Lichtman *
Muriel Kenfield-Kelleher *
LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013-1413

212.355.9500
jselbin@lchb.com
jlichtman@lchb.com
mkenfieldkelleher@lchb.com

By: s/ Andrew R. Kaufman
Andrew R. Kaufman *
LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP
222 2nd Avenue South, Suite 1640
Nashville, Tennessee 37201
615.313.9000
akaufman@lchb.com

By: s/ Russell D. Paul
Russell D. Paul *
Abigail J. Gertner **
Amey J. Park **
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
215.875.3000
rpaul@bm.net
agertner@bm.net
apark@bm.net

By: s/ Ketan A. Patel
Ketan A. Patel *
CORPUS LAW PATEL, LLC
P.O. Box 724713
Atlanta, Georgia 31139
678.597.8020
kp@corpus-law.com

By: s/ Tarek H. Zohdy
Tarek H. Zohdy *
Cody R. Padgett *
Laura E. Goolsby *
Capstone Law, APC
1875 Century Park East
Suite 1000
Los Angeles, CA 90067
Telephone: (310) 556-4811
Tarek.Zohdy@Capstonelawyers.com
Cody.Padgett@Capstonelawyers.com
Laura.Goolsby@Capstonelawyers.com

By: s/ Dennis A. Lienhardt

E. Powell Miller*

Dennis A. Lienhardt*

THE MILLER LAW FIRM PC

950 W. University Dr., Ste. 300

Rochester, MI 48307

Telephone: (248) 841-2200

Facsimile: (248) 652-2852

epm@millerlawpc.com

ssa@millerlawpc.com

Stephen R. Basser**

Samuel M. Ward**

BARRACK, RODOS, & BACINE

600 W Broadway, Suite 900

San Diego, CA 92101

Telephone: (619)230-0800

Facsimile: (619) 230-1874

sbasser@barrack.com

sward@barrack.com

John G. Emerson**

EMERSON FIRM, PLLC

2500 Wilcrest, Suite 300

Houston, TX 77042

jemerson@emersonfirm.com

Telephone: (800) 551-8649

Facsimile: (501) 286-4659

* admitted pro hac vice

** pro hac vice forthcoming

***Attorneys for Plaintiffs and the Proposed
Classes***