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*Attorneys for Defendant Zoox, Inc.*

12 **UNITED STATES DISTRICT COURT**  
 13 **NORTHERN DISTRICT OF CALIFORNIA**  
 14 **OAKLAND DIVISION**

15 TESLA, INC., a Delaware Corporation, )

16 Plaintiff, )

17 vs. )

18 )  
 19 ZOOX, INC., a Delaware Corporation; SCOTT )  
 20 TURNER, an individual; SYDNEY COOPER, an )  
 individual; CHRISTIAN DEMENT, an individual; )  
 21 and, CRAIG EMIGH, an individual, )

22 Defendants. )  
 23 \_\_\_\_\_ )

) Case No. 4:19-cv-01462-PJH

) **STIPULATION TO VOLUNTARY**  
 ) **DISMISSAL WITH PREJUDICE**

1 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), it is hereby stipulated by and  
2 between Plaintiff Tesla, Inc. (“Tesla”) and Defendants Zoox, Inc., Scott Turner, Sydney Cooper, and  
3 Craig Emigh (“Defendants”), through their respective attorneys, that:

4 WHEREAS, Tesla filed a Complaint in the above-captioned case on March 20, 2019;

5 WHEREAS, Tesla and Defendants have been engaged in settlement negotiations to resolve  
6 this matter;

7 WHEREAS, on April 13, 2020, Tesla and Defendants signed a settlement agreement;

8 NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED THAT the above-  
9 captioned action is voluntarily dismissed pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

10 It is further STIPULATED that the dismissal of this action is with prejudice and that each party  
11 will bear its own attorneys’ fees and costs.

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1 DATED: April 13, 2020

2 /s/ Sean M. McEldowney

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**ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest that I am the ECF user whose user ID and password are being used in the electronic filing of this document, and further attest that I have obtained the concurrence in the filing of the document from the other signatory.

/s/ Sean M. McEldowney  
Sean M. McEldowney

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**CERTIFICATE OF SERVICE**

On April 13, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all persons registered for ECF. All copies of documents required to be served by Fed. R. Civ. P. 5(a) and L.R. 5-1 have been so served.

/s/ Sean M. McEldowney  
Sean M. McEldowney