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14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16 **WESTERN DIVISION**

17 LESLEY CONTI, *et al.*, on behalf of
18 themselves and all others similarly
situated,

19 Plaintiffs,

20 v.

21 AMERICAN HONDA MOTOR CO.,
22 INC, a California corporation,

23 Defendant.

Case No.: 2:19-cv-2160 RGK (ASx)

[*The Honorable Cormac J. Carney*]

**JOINT NOTICE OF
SETTLEMENT IN PRINCIPLE**

Second Am. Compl. Filed: November
4, 2019

CLASS ACTION

1 Plaintiffs and Defendant American Honda Motor Co., Inc. (“AHM”) respectfully
2 provide this Notice to the Court that the Parties have reached an agreement in principle,
3 with the valuable assistance and efforts of the Honorable Dickran M. Tevrizian (ret.)
4 serving as mediator, to fully settle and resolve this action on a class-wide basis. The
5 Parties have executed a Term Sheet and anticipate formalizing the Term Sheet into a
6 Settlement Agreement, performing confirmatory discovery that will involve review of
7 materials and information by a mutually-agreed upon technical expert who is yet to be
8 retained, obtaining requisite formal approvals through the Honda quality approval
9 process as promptly as practicable, and then moving the Court soon thereafter to grant
10 preliminary approval of the proposed class action settlement.
11

12 AHM has agreed to pay reasonable attorneys’ fees, costs, and Class
13 Representative Service Awards, as may be mutually agreed by the Parties, or awarded
14 by the Court, with rights reserved. The proposed Settlement, however, is not conditioned
15 upon the Parties reaching an amicable resolution on these issues. Rather, the Parties
16 will engage in further discussions in an attempt to resolve those remaining issues. In
17 the event the Parties are unable to resolve their respective differences, the Parties will
18 reserve their respective rights, mutually brief the issues, and agree to submit the issues
19 for the Court to decide at the Court’s discretion.
20

21 In light of the Settlement in principle, the Parties respectfully request that the
22 Court continue to stay the telephonic status conference. (Doc. No. 63)
23
24

1 Dated: October 2, 2020

Respectfully submitted,

2 HAGENS BERMAN SOBOL SHAPIRO LLP

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Dated: October 2, 2020

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