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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

PETER JANKOVSKIS and JONATHAN
WHITE, individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

GENERAL MOTORS LLC,

Defendant.

No. 1:17-cv-07822

Judge Andrea R. Wood

**JOINT STIPULATION AND [PROPOSED] ORDER TRANSFERRING
CASE TO THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MICHIGAN**

Pursuant to 28 U.S.C. § 1404, Plaintiffs Peter Jankovskis and Jonathan White (“Plaintiffs”), and Defendant General Motors LLC (“GM”) (collectively, the “Parties”), by counsel, hereby submit this JOINT STIPULATION AND [PROPOSED] ORDER TO TRANSFER VENUE TO THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN.

Plaintiffs and GM, through their respective attorneys of record, agree and stipulate as follows:

On June 13, 2017, Plaintiffs’ counsel filed *Vazquez et al. v. General Motors LLC*, No. 1:17-cv-22209 (S.D. Fla.). On October 20, 2017, Plaintiffs’ counsel filed *Jasper et al. v. General Motors LLC*, No. 5:17-cv-06284 (N.D. Cal.), *Minarik v. General Motors LLC*, No. 2:17-cv-01615-JCC (W.D. Wash.), and *Jankovskis et al. v. General Motors LLC*, No. 1:17-cv-07822 (N.D. Ill.). These actions involve common factual issues arising from nearly identical putative

statewide class actions that concern the marketing, sale and performance of the 2015-2017 model years Corvette Z06.

On November 1, 2017, Plaintiffs' counsel, on behalf of plaintiffs in all four actions, filed with the United States Judicial Panel on Multidistrict Litigation ("JPML") a motion to transfer all four actions to the Southern District of Florida (*see In Re: Corvette Z06 Mktg. and Sales Practices Litig.*, MDL No. 2815 (J.P.M.L. Nov. 1, 2017)). GM agreed that consolidation for pretrial purposes pursuant to 28 U.S.C. § 1407 is appropriate.

On November 22, 2018, the Parties filed a stipulation extending the deadline for GM to answer or otherwise respond to the Plaintiffs' Class Action Complaint in this action to 21 days after the JPML ruled on Plaintiffs' Motion for Transfer.

On February 2, 2018, the JPML issued its order declining to consolidate for pretrial purposes, instructing that "[t]ransfer under Section 1404 to a single, agreed-upon district appears to be a viable option to place the cases before a single judge for all purposes."

On February 20, 2018, Plaintiffs' counsel filed *Matanky et al. v. General Motors LLC*, No. 2:18-cv-10601-VAR-APP (E.D. Mich.). The *Matanky* complaint alleges the same factual allegations as the four other actions and asserts parallel putative statewide class claims on behalf of Z06 purchasers in eleven states.

GM's response to the complaint in this case is due on March 16, 2018.

During the week of February 26, 2018, the Parties met and conferred regarding transfer of venue to the Eastern District of Michigan.

On March 9, 2018, the Northern District of California transferred the parallel *Jasper* action to the Eastern District of Michigan, finding that "both parties will benefit from litigating the various related cases in one forum before one judge instead of in five different districts

before five different judges.” See Exhibit 1 to Joint Motion to Enter Proposed Order to Transfer Venue. On March 9, 2018, GM moved to transfer the parallel *Vazquez* action from the Southern District of Florida to the Eastern District of Michigan. To conserve the resources of the Court and the Parties, the Parties agree to transfer this case to the Eastern District of Michigan for coordination and/or consolidation with the parallel *Matanky* action pending in that court.

In addition, the Parties ask that the schedule set by the Court in the March 6, 2018 minute order [Dkt. 30] be vacated, and that GM’s March 16, 2018 deadline to respond to the complaint be stayed. If the Court grants the Parties’ request to transfer this case to the Eastern District of Michigan, the Parties agree that GM will have no less than 30 days after receipt of the case by the Eastern District of Michigan to file an answer or a motion to dismiss. The Parties agree to promptly seek a status conference with the transferee court to address a schedule for this action, including a deadline for GM to answer or file a motion to dismiss the complaint.

The Parties agree that neither side is prejudiced by the agreements set forth herein.

THEREFORE, the Parties hereby stipulate and agree, subject to Court approval, to transfer this case to the Eastern District of Michigan.

IT IS SO STIPULATED.

Dated: March 12, 2018

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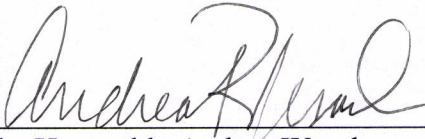
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Attorney for Defendant General Motors LLC

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The Clerk shall transfer the case to the United States District Court for the Eastern District of Michigan and close the case file in this district.

DATED: March 14, 2018.



The Honorable Andrea Wood
United States District Judge