## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JUNE E. ADAMS IRREVOCABLE TRUST:
DATED 7/21/14 FBO EDWARD ROBERT:
ADAMS, Individually and on Behalf of All:
Others Similarly Situated,:

Plaintiff,

VS.

INTERNATIONAL BUSINESS MACHINES CORPORATION, VIRGINIA M. ROMETTY, MARTIN J. SCHROETER, JAMES J. KAVANAUGH and ARVIND KRISHNA,

Defendants.

Civil Action No. 7:22-cv-02831-VLB

## **CLASS ACTION**

NOTICE OF VOLUNTARY DISMISSAL PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(i)

PLEASE TAKE NOTICE that Lead Plaintiff Iron Workers Local 580 Joint Funds hereby voluntarily dismisses this action without prejudice against all defendants. A class has not been certified in this action, and no defendant in this action has served an answer or a motion for summary judgment.

DATED: September 21, 2022 Respectfully submitted,

ROBBINS GELLER RUDMAN & DOWD LLP SAMUEL H. RUDMAN DAVID A. ROSENFELD

/s/ Samuel H. Rudman

SAMUEL H. RUDMAN

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Attorneys for Lead Plaintiff