

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO.: 1:14-cv-22113-COOKE/TORRES

NATHAN DAPEER, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

NEUTROGENA CORP.,

Defendant.

JOINT STIPULATION FOR DISMISSAL WITH PREJUDICE

Plaintiff Nathan Dapeer and Defendant Neutrogena Corporation, by and through their respective undersigned counsel, and pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), hereby stipulate and agree to dismiss with prejudice all claims asserted or which could have been asserted in this action against Defendant, with each party to bear his or its own costs and attorneys' fees in connection with this litigation. A proposed order is attached hereto.

Respectfully submitted this 1st day of March, 2016.

/s/ Abigail M. Lyle

Samuel A. Danon, FBN 0892671

Abigail M. Lyle, FBN 41384

HUNTON & WILLIAMS LLP

1111 Brickell Avenue, Suite 2500

Miami, Florida 33131

Telephone: 305.810.2500

Facsimile: 305.810.2460

Email: sdanon or alyle@hunton.com

/s/ Jonathan M. Streisfeld

Jeffrey M. Ostrow, FBN 121452

Jonathan M. Streisfeld, FBN 117447

Scott A. Edelsberg, FBN 100537

KOPELOWITZ OSTROW P.A.

200 S.W. 1st Avenue, 12th Floor

Fort Lauderdale, FL 33301

Telephone: (954) 525-4100

Facsimile: (954) 525-4300

Email: ostrow, streisfeld, or

edelsberg@kolawyers.com

Amy J. Laurendeau (admitted *pro hac vice*)
Richard B. Goetz (admitted *pro hac vice*)
Joseph O'Connor (admitted *pro hac vice*)
O'MELVENY & MYERS LLP
610 Newport Center Dr., 17th Fl.
Newport Beach, CA 92660
Telephone: 949.760.9600
Facsimile: 949.823.6994
Email: alaurendeau, rgoetz, or
joconnor@omm.com

Counsel for Defendant Neutrogena Corp.

Hassan Zavareei (admitted *pro hac vice*)
Andrea Gold (admitted *pro hac vice*)
TYCKO & ZAVAREEI LLP
2000 L Street, N.W., Suite 808
Washington, D.C. 20036
Telephone: (202) 973-0900
Facsimile: (202) 973-0950
Email: hzavareei or agold@tzlegal.com

John Allen Yanchunis, Sr., FBN 324681
Rachel Lynn Soffin, FBN 18054
MORGAN & MORGAN
Complex Litigation Group
One Tampa City Center, 7th Floor
Tampa, FL 33609
Telephone: (813) 223-5505
Email: jyanchunis, rsoffin@forthepeople.com

Counsel for Plaintiff Nathan Dapeer

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel for Plaintiff via transmission of Notices of Electronic Filing generated by CM/ECF.

By: /s/ Abigail M. Lyle
Abigail M. Lyle

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 1:14-cv-22113-COOKE/TORRES

NATHAN DAPEER, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

NEUTROGENA CORP.,

Defendant.

**[PROPOSED] ORDER ON JOINT STIPULATION FOR DISMISSAL
WITH PREJUDICE**

THIS MATTER is before the Court upon the Parties' Joint Stipulation for Dismissal with Prejudice (the "Stipulation"). Having reviewed the Stipulation, I hereby **ORDER and ADJUDGE** as follows:

1. All claims asserted in the above-styled matter are **DISMISSED *with prejudice***; and
2. Each party shall bear his or its own attorneys' fees and costs in connection with this case; and
3. The Clerk shall **CLOSE** this case. All pending motions, if any, are **DENIED *as moot***.

DONE and ORDERED in chambers, at Miami, Florida, this ____ day of March 2016.

HONORABLE MARCIA G. COOKE
U.S. DISTRICT COURT JUDGE

Copies furnished to:

Hon. Edwin G. Torres, U.S. Magistrate Judge
Counsel of Record