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14 [Additional counsel appear on signature page.]

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

19 In re CLOROX CONSUMER LITIGATION) Master File No. 12-cv-00280-SC
20 _____) CLASS ACTION
This Document Relates To:) **JOINT STIPULATION OF DISMISSAL**
21 ALL ACTIONS.) **WITH PREJUDICE**
22 _____) JUDGE: The Honorable Samuel Conti
23)
24)
25)
26 _____)

1 Plaintiffs Megan Sterritt, Kristin Luszcz, Lori Kowalewski, Tina Butler-Furr, Catherine
2 Lenz, and Susan Doyle (collectively “Plaintiffs”) and Defendant The Clorox Company (Plaintiffs
3 and the Defendant are collectively referred to herein as the “Parties”), by and through their
4 undersigned counsel, hereby notify the Court that the Parties have entered into a written
5 settlement agreement and stipulate and agree as follows, in accordance with that agreement:

6 1. The Parties have reached a settlement pursuant to which Plaintiffs have agreed,
7 pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), to dismiss this action with prejudice.
8 Nothing in this Stipulation shall have any effect on the claims, if any, of absent members of the
9 putative classes proposed in Dkt. No. 99.

10 2. The Parties stipulate and agree that the arguments, claims, defenses, demands,
11 liabilities, rights, and causes of action asserted by Plaintiffs and Defendant, including those
12 asserted by counsel of both Plaintiffs and Defendant, were conducted in good faith and no Party
13 shall have any claim to sanctions, damages, or relief based on the conduct of any other party,
14 counsel, or individual that transpired in this case, to the extent that the conduct of another party,
15 counsel, or individual was known by the Party at the time of the execution of the settlement
16 agreement.

17
18 DATED: February 18, 2015

Respectfully submitted,

19
20 */s/ Gregory S. Ascioffa*

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/s/ Kenneth K. Lee

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*Counsel for Defendant The Clorox Pet Products
Company, improperly sued as The Clorox
Company*

CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 18, 2015.

/s/ Robin A. van der Meulen

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19 _____) CLASS ACTION

20 This Document Relates To:)

21 ALL ACTIONS.)

**[PROPOSED] ORDER GRANTING THE
PARTIES' JOINT STIPULATION OF
DISMISSAL WITH PREJUDICE**

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[PROPOSED] ORDER

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and the Parties' Joint Stipulation of Dismissal With Prejudice, the Court hereby dismisses the above-captioned case, with prejudice.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Honorable Samuel Conti
United States District Court Judge