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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

20 KENRIC CLAIBORNE, on Behalf of
 21 Himself, All Others Similarly
 22 Situated, and the General Public,

Plaintiff,

v.

24 CHURCH & DWIGHT CO., INC.,

Defendant.

Case No: 3:17-cv-00746-L-JLB

CLASS ACTION

JOINT MOTION TO DISMISS

Judge: Hon. M. James Lorenz
 Ctrm.: 5B – 5th Floor
 Action Filed: April 13, 2017

1 Plaintiff Kenric Claiborne ("Plaintiff"), individually and on behalf of others
2 similarly situated, and defendant Church & Dwight Co., Inc. ("Defendant," together
3 with Plaintiff, the "Parties") jointly move the Court to dismiss the above-captioned
4 action with prejudice as to Kenric Claiborne and without prejudice as to the
5 putative Class. This joint motion is made with respect to the following:

6 1. The Parties have reached a resolution of this action.

7 2. Defendant, without acknowledging liability or wrongdoing, and
8 Plaintiff, without acknowledging liability or wrong doing, have agreed to resolve
9 this matter.

10 3. No class has been certified and the unnamed putative class members
11 have not and are not releasing any claims, are not having their rights affected, and
12 will suffer no prejudice as part of the terms under which this case is being
13 dismissed.

14 4. The Parties agree that this Court can proceed to dismiss the action with
15 prejudice as to Plaintiff and without prejudice as to the putative Class.

16 WHEREFORE, Plaintiff and Defendant respectfully request that this Court
17 dismiss this action with prejudice as to Plaintiff and without prejudice as to the
18 putative Class.

19 Dated: May 4, 2018

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SIGNATURE CERTIFICATION

Pursuant to Section 2(4)(4) of Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Baldassare Vinti, counsel for Defendant Church & Dwight Co., Inc., and that I have obtained Mr. Vinti's authorization to affix his electronic signature to this document.

Dated: May 4, 2018

ROBBINS ARROYO LLP

s/ Steven M. McKany

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CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2018, I electronically filed 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.

s/ Steven M. McKany

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