

1 **KELLEY DRYE & WARREN LLP**
Lee S. Brenner (State Bar No. 180235)
2 Tahir L. Boykins (State Bar No. 323441)
10100 Santa Monica Boulevard, 23rd Floor
3 Los Angeles, CA 90067-4008
Telephone: (310) 712-6100
4 Facsimile: (310) 712-6199
lbrenner@kelleydrye.com
5 tboykins@kelleydrye.com

6 **KELLEY DRYE & WARREN LLP**
Jeffrey S. Jacobson (*Pro Hac Vice Pending*)
7 One Jefferson Road
Parsippany, New Jersey, 07054
8 Telephone: (973) 503-5900
Facsimile: (973) 503-5950
9 jjacobson@kelleydrye.com

10 *Attorneys for Defendant Jeunesse, LLC*

11 **LINDEMANN LAW FIRM, APC**
12 Blake J. Lindemann (State Bar No. 255747)
433 N. Camden Drive, 4th Floor
13 Beverly Hills, CA 90210
Telephone: (310) 279-5269
14 Facsimile: (310) 300-0267
E-mail: blake@lawbl.com

15 *Attorneys for Plaintiff*

17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

19 HELEN XIONG aka Huiqin Xiong, an
20 individual; on behalf of herself and those
similarly situated,

21 Plaintiffs,

22 v.

23 JEUNESSE GLOBAL, LLC dba
24 JEUNESSE, LLC; KIM HUI; and DOES
1-10,

25 Defendants.

Case No. 8:18-cv-01430-DOC-KES

Hon. David O. Carter

**JOINT STIPULATION TO
CONTINUE STAY**

26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

STIPULATION

Plaintiff Helen Xiong aka Huiqin Xiong (“Plaintiff”) and Defendant Jeunesse, LLC (“Jeunesse”) (collectively, the “Parties”), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, Plaintiff filed her Complaint (Dkt. No. 1) on August 10, 2018;

WHEREAS, Jeunesse was served with the Complaint on November 13, 2018;

WHEREAS, on November 28, 2018, the Court entered an Order that “[a]ll proceedings in this action are stayed through and including, the date of entry of a final Order by the District Court of the Middle District of Florida on the motion for approval of Class Action settlement in *Aboltin et al. v. Jeunesse et al.*, Case No. 6:17-cv-01624-PGB [the (“M.D. Fla. Action”)]” (Dkt. No. 22);

WHEREAS, on January 9, 2019, the Court entered an Order Granting Plaintiffs’ Motion for Final Approval of Class Action Settlement in the M.D. Fla. Action (“Class Action Settlement Order”) (M.D. Fla. Action Dkt. No. 292);

WHEREAS, Plaintiff was the only class member to object to the proposed settlement in the M.D. Fla. Action;

WHEREAS, on January 9, 2019 Plaintiff filed a Notice of Appeal of the Class Action Settlement Order (M.D. Fla. Action Dkt. No. 293);

WHEREAS, due to Plaintiff’s appeal, the Class Action Settlement Order is not yet final;

WHEREAS, the Parties agree that both efficiency and preservation of judicial resources warrant the continuance of the stay entered by this Court until after a mandate is used on the appeal;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, subject to the approval of the Court:

1. All proceedings in this action are stayed through and including, the date of mandate on the appeal.
2. Defendant Jeunesse, LLC will have until 45 days after the mandate is

1 issued to answer, move, or otherwise respond to the Complaint.

2 3. Defendant Kim Hui, if served, will have until 45 days after the mandate
3 is issued to answer, move, or otherwise respond to the Complaint.

4
5 **IT IS SO STIPULATED.**

6
7 DATED: February 25, 2019 Kelley Drye & Warren LLP
8 Jeffrey S. Jacobson (*Pro Hac Vice Pending*)
9 Lee S. Brenner
Tahir L. Boykins

10 By /s/ Tahir L. Boykins
11 Tahir L. Boykins
12 *Attorneys for Defendant Jeunesse, LLC*

13 DATED: February 25, 2019 Lindemann Law Firm, APC
14 Blake J. Lindemann
15 By /s/ Blake J. Lindemann
16 Blake J. Lindemann
17 *Attorneys for Plaintiff*

18 Pursuant to Local Rule 5-4.3.4(a)(2)(i), I attest that all other signatories listed,
19 and on whose behalf the filing is submitted, concur in the filing of this stipulation and
20 have authorized the filing of this stipulation.

21
22 DATED: February 25, 2019 Kelley Drye & Warren LLP
23 Tahir L. Boykins
24 By /s/ Tahir L. Boykins
25 Tahir L. Boykins
26 *Attorneys for Defendant Jeunesse, LLC*
27
28

1 **KELLEY DRYE & WARREN LLP**
Lee S. Brenner (State Bar No. 180235)
2 Tahir L. Boykins (State Bar No. 323441)
10100 Santa Monica Boulevard, 23rd Floor
3 Los Angeles, CA 90067-4008
Telephone: (310) 712-6100
4 Facsimile: (310) 712-6199
lbrenner@kelleydrye.com
5 tboykins@kelleydrye.com

6 **KELLEY DRYE & WARREN LLP**
Jeffrey S. Jacobson (*Pro Hac Vice Pending*)
7 One Jefferson Road
Parsippany, New Jersey, 07054
8 Telephone: (973) 503-5900
Facsimile: (973) 503-5950
9 jjacobson@kelleydrye.com

10 *Attorneys for Defendant Jeunesse, LLC*

11 **LINDEMANN LAW FIRM, APC**
Blake J. Lindemann (State Bar No. 255747)
12 433 N. Camden Drive, 4th Floor
Beverly Hills, CA 90210
13 Telephone: (310) 279-5269
Facsimile: (310) 300-0267
14 E-mail: blake@lawbl.com

15 *Attorneys for Plaintiff*

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

18 HELEN XIONG aka Huiqin Xiong, an
19 individual; on behalf of herself and those
similarly situated,

20 Plaintiffs,

21 v.

22 JEUNESSE GLOBAL, LLC dba
23 JEUNESSE, LLC; KIM HUI; and DOES
1-10,

24 Defendants.

Case No. 8:18-cv-01430-DOC-KES
Hon. David O. Carter

**[PROPOSED] ORDER GRANTING
JOINT STIPULATION TO
CONTINUE STAY**

1 Pursuant to the Joint Stipulation to Continue the Stay of this action filed by
2 Plaintiff Helen Xiong aka Huiqin Xiong (“Plaintiff”) and defendant Jeunesse, LLC
3 (“Jeunesse”) (collectively, “the Parties”), and good cause appearing therefor, IT IS
4 HEREBY ORDERED that:

5 1. All proceedings in this action are stayed through and including the date
6 of mandate on Plaintiff’s appeal in *Aboltin, et al. v. Xiong*, No. 19-10125-C (11th
7 Cir.).

8 2. Defendant Jeunesse, LLC will have until 45 days after the mandate is
9 issued to answer, move, or otherwise respond to the Complaint.

10 3. Defendant Kim Hui, if served, will have until 45 days after the mandate
11 is issued to answer, move, or otherwise respond to the Complaint.

12 **IT IS SO ORDERED.**

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Hon. David O. Carter
United States District Judge