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Counsel for Defendant
S. C. Johnson & Son, Inc.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

IN RE: S.C. JOHNSON & SON, INC.
WINDEX NON-TOXIC LITIGATION

Master File No. 4:20-cv-03184-HSG
Assigned Hon. Hayward S. Gilliam

Consolidated Case Nos. 4:20-cv-03184-HSG
(*Moran v. S.C. Johnson & Son, Inc.*, filed
5/8/2020; and 4:20-cv-03820-DMR (*Waddell*
v. S.C. Johnson & Son, Inc., filed 6/10/2020))

This Document Relates To: All Actions

**PLAINTIFF MICHELLE MORAN'S
STIPULATED VOLUNTARY
DISMISSAL OF ALL CLAIMS
PURSUANT TO FED. R. CIV. P.
41(a)(1)(A)(ii)**

N.D. Cal. Master File No. 4:20-cv-03184

PLAINTIFF MICHELLE MORAN'S STIPULATED VOLUNTARY DISMISSAL WITH PREJUDICE
(Fed. R. Civ. P. 41(a)(1)(A)(ii))

SF-4812342

1 Plaintiff Michelle Moran (“Plaintiff Moran”) and Defendant S. C. Johnson & Son, Inc.
2 (“Defendant”), by and through their undersigned counsel, hereby stipulate to the dismissal with
3 prejudice of all of Plaintiff Moran’s claims against Defendant asserted in this action, and her claims
4 only, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), as follows:

5 WHEREAS, on May 8, 2020, Plaintiff Moran filed a class action complaint against
6 Defendant commencing this action (ECF 1);

7 WHEREAS, on November 16, 2020, Plaintiff Moran, along with Monica Waddell, filed the
8 operative consolidated class action complaint in this case (ECF 42);

9 WHEREAS, on February 14, 2022, the Superior Court of California, County of Alameda
10 issued an order granting final approval of class action settlement, certifying the settlement class, and
11 apportioning attorneys’ fees and costs in *Clark v. S.C. Johnson & Son, Inc.*, No. RG20067897 (Cal.
12 Super. Ct.) (“*Clark* Final Approval Order”), which included Plaintiff Moran’s claims asserted against
13 Defendant in this case;

14 WHEREAS, no party filed a notice of appeal of the *Clark* Final Approval Order before the
15 April 15, 2022 deadline;

16 WHEREAS, on April 26, 2022, Plaintiff Moran and Defendant conferred regarding a mutual
17 waiver of attorneys’ fees and costs in exchange for the dismissal of Plaintiff Moran’s individual
18 claims against Defendant with prejudice.

19 NOW THEREFORE, IT IS HEREBY AGREED AND STIPULATED that

20 1. Plaintiff Moran and Defendant waive all rights to recover from each other attorneys’
21 fees and costs incurred in connection with the prosecution or defense of this action, with the
22 exception of the enforcement of the *Clark* Final Approval Order; and

23 2. Plaintiff Moran’s claims asserted in this action against Defendant are hereby dismissed
24 with prejudice.

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28 N.D. Cal. Master File No. 4:20-cv-03184

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1 Dated: May 2, 2022

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9 Dated: May 2, 2022

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17 Dated: May 2, 2022

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ATTESTATION OF FILER

Pursuant to Civil Local Rule 5-1(i)(3), the undersigned filer hereby attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: May 2, 2022

/s/ Katherine A. Bruce

By: Katherine A. Bruce, Esq.

Attorneys for Plaintiff Michelle Moran

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