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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IRIS ARROYO, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

UNILEVER UNITED STATES, INC., and
CONOPCO, INC. d/b/a UNILEVER
HOME & PERSONAL CARE USA,

Defendants.

Case No. 2:21-cv-00302-SDW-LDW

**CONSENT ORDER TRANSFERRING ACTION
TO THE NORTHERN DISTRICT OF ILLINOIS**

THIS MATTER having been presented to the Court through the undersigned counsel upon the consent of Plaintiff Iris Arroyo (“Plaintiff”) and Defendants Unilever United States, Inc. and Conopco, Inc. d/b/a Unilever Home & Personal Care USA (collectively, “Defendants,” and together with Plaintiff, the “Parties”):

WHEREAS, Plaintiff commenced the above-captioned action (this “Action”) on January 7, 2021;

WHEREAS, substantially similar actions have been filed in other jurisdictions, specifically: (i) *Castillo v. Unilever United States, Inc., et al.*, No. 1:20-cv-06786, filed on

November 16, 2020, in the United States District Court for the Northern District of Illinois (the “First-Filed Action”); (ii) *Libbey v. Unilever United States, Inc., et al.*, No. 4:20-cv-08075-JSW, filed on November 16, 2020, in the United States District Court for the Northern District of California; and (iii) *Lipetz, et al. v. Unilever United States, Inc. et al.*, No. 2:20-cv-06350-CFK, filed on December 17, 2020, in the United States District Court for the Eastern District of Pennsylvania (collectively, the “Related Actions”);

WHEREAS, the Plaintiff in this Action and the plaintiffs in the Related Actions are represented by overlapping counsel;

WHEREAS, this Action and the Related Actions involve the same Defendants and are asserted on behalf of nationwide putative classes of purchasers of the same products manufactured by Defendant Unilever United States, Inc.;

WHEREAS, this Action and the Related Actions involve substantially similar issues of fact and law;

WHEREAS, litigating this Action and the Related Actions in separate jurisdictions would be inefficient and present the risk of inconsistent results, and would be inconvenient to the Parties and witnesses alike;

WHEREAS, having this Action and the Related Actions proceed before the same Court will eliminate the potential for inconsistent rulings on critical pretrial motions, including class certification, eliminate the burden of duplicative discovery on common issues, prevent unnecessary use of judicial resources, and reduce the overall costs and burdens for all parties;

WHEREAS, the Parties jointly seek to transfer this Action to the United States District Court for the Northern District of Illinois, the jurisdiction in which the First-Filed Action was

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s/ Gavin J. Rooney
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