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Attorneys for Plaintiff,

Steven Lavallee

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

STEVEN LAVALLEE, Individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

DERMALOGICA, LLC and
CONOPCO, INC. d/b/a UNILEVER,

Defendants.

Case No.: 8:25-cv-01013-DOC-ADS

**JOINT STIPULATION TO
DISMISS ACTION PURSUANT TO
FED. R. CIV. P. 41(a)(1)(A)(ii)**

HON. DAVID O. CARTER

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1 Plaintiff Steven Lavalee (“Plaintiff”) and defendants Dermalogica, LLC and
2 Conopco, Inc., d/b/a Unilever (“Defendants”) (together, the “Parties”), through their
3 respective counsel of record, jointly stipulate and request dismissal of Plaintiff’s
4 individual claims against Defendants *with prejudice* and dismissal of the putative
5 class members’ claims *without prejudice*, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii).

6 The Parties further agree to bear their own respective fees and costs.

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8 **IT IS SO STIPULATED.**

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11 Dated: October 24, 2025

Respectfully submitted,

KAZEROUNI LAW GROUP, APC

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13 By: /s/ PAMELA E. PRESCOTT, ESQ.
14 ABBAS KAZEROUNIAN, ESQ.
15 PAMELA E. PRESCOTT, ESQ.
16 *ATTORNEYS FOR PLAINTIFFS*

17 Dated: October 24, 2025

Respectfully submitted,

PERKINS COIE LLP

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19 By: /s/ KRISTINE E. KRUGER, ESQ.
20 DAVID T. BIDERMAN, ESQ.
21 KRISTINE E. KRUGER, ESQ.
22 *ATTORNEYS FOR DEFENDANT*



SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant and that I have obtained authorization to affix their electronic signature to this document.

By: /s/ Pamela E. Prescott
Pamela E. Prescott, Esq.



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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

STEVEN LAVALLEE, Individually
and on behalf of all others similarly
situated,

Plaintiffs,

v.

DERMALOGICA, LLC and
CONOPCO, INC. d/b/a
UNILEVER,

Defendants.

Case No.: 8:25-cv-01013-DOC-ADS

**[PROPOSED] ORDER GRANTING
JOINT STIPULATION TO DISMISS
ACTION PURSUANT TO FED. R.
CIV. P. 41(a)(1)(A)(ii)**

HON. DAVID O. CARTER

Good causing appearing, the stipulated request of plaintiff Steven Lavallee (“Plaintiff”) and defendants Dermalogica, LLC and Conopco, Inc. and d/b/a Unilever, (“Defendants”) (together, the “Parties”), for dismissal of Plaintiff’s individual claims against Defendant *with prejudice* and dismissal of the claims of the putative class members against Defendant *without prejudice*, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), is hereby GRANTED.

The Parties shall each bear their own respective attorneys’ fees and costs.

IT IS SO ORDERED.

Dated: _____

Hon. David O. Carter
United States District Judge