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10 Attorneys for Defendants
Dermalogica, LLC and Conopco, Inc. d/b/a Unilever

11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14

15 STEVEN LAVALLEE, Individually
and on behalf of all others similarly
16 situated,
17 Plaintiff,
18 v.
19 DERMALOGICA, LLC and
CONOPCO, INC. d/b/a UNILEVER,
20 Defendants.
21

Case No. 8:25-cv-01013-DOC-ADS
**STIPULATION TO EXTEND THE
STAY OF CASE PENDING
SETTLEMENT**
Complaint served: June 20, 2025

22 Plaintiff Steven Lavallee (“Plaintiff”) and Defendants Dermalogica, LLC and
23 Conopco, Inc. d/b/a Unilever (“Defendants”) (collectively the “Parties”) stipulate
24 and agree as follows:

- 25 1. Plaintiff filed his complaint on May 13, 2025;
26 2. Defendants waived service on June 20, 2025;
27 3. Under Federal Rule of Civil Procedure 12(a)(1)(A)(ii), Defendants’
28 deadline to respond to the complaint was July 21, 2025;

1 4. Plaintiff filed his First Amended Complaint on July 18, 2025 (“FAC”);

2 5. The Parties stipulated and agreed to extend Defendants’ deadline to
3 respond to the FAC to August 19, 2025;

4 6. The Parties reached a settlement in principle;

5 7. On August 15, 2025, the Parties stipulated and agreed to extend all
6 deadlines by 30 days to allow time to finalize the settlement agreement;

7 8. On September 11, 2025, the Parties stipulated and agreed to extend all
8 deadlines by an additional 30 days to allow time to finalize the settlement
9 agreement and finalize the settlement payment; and

10 9. The Parties have met and conferred, through their respective attorneys,
11 and jointly request that the Court stay all deadlines in the case for an additional 17
12 days to allow time to finalize the settlement agreement and file the dismissal
13 papers.

14 **NOW, THEREFORE**, the Parties hereby stipulate and respectfully request
15 the Court to stay all deadlines for an additional 17 days until October 31, 2025.

16 **IT IS SO STIPULATED AND AGREED.**

17

18 Dated: October 14, 2025

PERKINS COIE LLP

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20

By: /s/ Kristine E. Kruger

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David T. Biderman
Kristine E. Kruger

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Attorneys for Defendants
Dermalogica, LLC and Conopco, Inc.
d/b/a Unilever

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Dated: October 14, 2025

KAZEROUNI LAW GROUP, APC

By: /s/ Pamela E. Prescott

Abbas Kazerounian

Pamela E. Prescott

Attorneys for Plaintiff
Steven Lavallee

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FILER’S ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Kristine E. Kruger, hereby attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing’s content and have authorized this filing.

Dated: October 14, 2025

Respectfully submitted,
PERKINS COIE LLP

By: /s/ Kristine E. Kruger
Kristine E. Kruger

Attorney for Defendant
Dermalogica, LLC and Conopco, Inc.
d/b/a Unilever

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19 DERMALOGICA, LLC and
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21 Defendants.
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Case No. 8:25-cv-01013-DOC-ADS

**[PROPOSED] ORDER GRANTING
STIPULATION TO EXTEND THE
STAY OF CASE PENDING
SETTLEMENT**

Complaint served: June 20, 2025

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The Court, having considered the Parties Stipulation to Extend the Stay of Case Pending Settlement (“Stipulation”) and finding good cause therefor, hereby GRANTS the Stipulation and ORDERS as follows:

All deadlines in the case are stayed for an additional 17 days until October 31, 2025 to allow time to finalize the settlement agreement and file the dismissal papers.

IT IS SO ORDERED.

Dated: _____, 2025

Hon. David O. Carter
United State District Judge