

KAZEROUNI LAW GROUP, APC

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Attorneys for Plaintiff,

Kaitlyn Roblyer

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

KAITLYN ROBLYER, Individually
and on Behalf of Others Similarly
Situated,

Plaintiff,

v.

PAULA’S CHOICE, INC.;
PAULA’S CHOICE, LLC; and
CONOPCO, INC., d/b/a
UNILEVER,

Defendants.

Case No.: 2:25-cv-01364-DJC-CSK

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

HON. DANIEL J. CALABRETTA

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

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

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9 **IT IS SO STIPULATED.**

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12 Dated: October 24, 2025

Respectfully submitted,

KAZEROUNI LAW GROUP, APC

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

17
18 Dated: October 24, 2025

Respectfully submitted,

PERKINS COIE LLP

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



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2 **SIGNATURE CERTIFICATION**

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

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



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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

KAITLYN ROBLYER, Individually
and on behalf of all others similarly
situated,

Plaintiffs,

v.

PAULA’S CHOICE, INC.;
PAULA’S CHOICE, LLC; and
CONOPCO, INC., d/b/a
UNILEVER,

Defendants.

Case No.: 2:25-cv-01364-DJC-CSK

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

HON. DANIEL J. CALABRETTA

Good causing appearing, the stipulated request of plaintiff Kaitlyn Roblyer (“Plaintiff”) and defendants Paula’s Choice, Inc., Paula’s Choice, LLC and Conopco, Inc., 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. Daniel J. Calabretta
United States District Judge