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9 Attorneys for Defendants
Paula’s Choice, Inc.; Paula’s Choice, LLC;
10 and CONOPCO, Inc. d/b/a Unilever

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA
13 SACRAMENTO DIVISION

14
15 KAITLYN ROBLYER, Individually and on
16 Behalf of Others Similarly Situated,

17 Plaintiff,

18 v.

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

21 Defendants.

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

STIPULATION TO EXTEND THE
DEADLINE TO FILE DISMISSAL OF CASE

Judge: Hon. Daniel J. Calabretta

22 Pursuant to Civil Local Rule 144(a), Plaintiff Kaitlyn Roblyer (“Plaintiff”) and
23 Defendants Paula’s Choice, Inc., Paula’s Choice, LLC, and Conopco, Inc. d/b/a Unilever
24 (“Defendants”) (collectively the “Parties”) stipulate and agree as follows:

- 25 1. Plaintiff filed her Complaint on May 13, 2025;
26 2. Defendants’ counsel executed Waivers of Service of Summons, which were served
27 on Plaintiff’s counsel on June 20, 2025;

1 3. Under Federal Rule of Civil Procedure 12(a)(1)(A)(ii), Defendants’ deadline to
2 respond to the Complaint was July 21, 2025;

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

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

6 6. The Parties reached a settlement in principal and jointly notified the Court of the
7 settlement;

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

10 8. The Court issued a Minute Order on August 15, 2025 vacating all hearing dates
11 and deadlines, and setting a deadline of September 15, 2025 to file the dismissal papers;

12 9. On September 12, 2025, the Parties stipulated and agreed to extend all deadlines
13 by 30 days to allow time to finalize the settlement agreement;

14 10. The Court issued a Minute Order on September 15, 2025 vacating all hearing dates
15 and deadlines, and setting a deadline of October 15, 2025 to file the dismissal papers;

16 11. The Parties have met and conferred, through their respective attorneys, and jointly
17 request that the Court continue the deadline to file the dismissal papers by an additional 30 days
18 to allow time to finalize the settlement and file the dismissal papers.

19 **NOW, THEREFORE**, the Parties hereby stipulate and respectfully request the Court
20 continue the dismissal deadline an additional 16 days until October 31, 2025.

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IT IS SO STIPULATED AND AGREED.

Dated: October 14, 2025

KAZEROUNI LAW GROUP, APC

By: /s/ Pamela E. Prescott

Abbas Kazerounian, Bar No. 249203
Pamela E. Prescott, Bar No. 328243

Attorneys for Plaintiff
Kaitlyn Roblyer

Dated: October 14, 2025

PERKINS COIE LLP

By: /s/ Kristine E. Kruger

David T. Biderman, Bar No. 101577
Kristine E. Kruger, Bar No. 253593

Attorneys for Defendants
Paula's Choice, Inc.; Paula's Choice, LLC;
and CONOPCO, Inc. d/b/a Unilever

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SIGNATURE ATTESTATION

Pursuant to Local Rule 131(e), I hereby certify that the content of this document is acceptable to Abbas Kazerounian, counsel for Plaintiffs, and I have obtained Abbas Kazerounian’s authorization to affix his signature to this document.

Dated: October 14, 2025

Respectfully submitted,

PERKINS COIE LLP

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

Attorney for Defendants
Paula’s Choice, Inc.; Paula’s Choice, LLC;
and CONOPCO, Inc. d/b/a Unilever

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

[PROPOSED] ORDER GRANTING
STIPULATION TO EXTEND DEADLINE
TO FILE DISMISSAL OF CASE

Judge: Hon. Daniel J. Calabretta

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WHEREAS, the Court has reviewed the Parties' Stipulation to Extend the Deadline to file Dismissal of the Case and finds that good cause exists to grant the requested relief;

IT IS HEREBY ORDERED that the deadline to file the dismissal papers is extended by an additional sixteen (16) days until October 31, 2025 to permit the Parties to finalize the settlement agreement.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____, 2025

The Honorable Daniel J. Calabretta
United States District Judge