

1 **KJC LAW GROUP, A.P.C.**

2 Kevin J. Cole (SBN 321555)

3 *kevin@kjclawgroup.com*

4 W. Blair Castle (SBN 354085)

5 *blair@kjclawgroup.com*

6 9701 Wilshire Blvd., Suite 1000

7 Beverly Hills, CA 90212

8 Telephone: (310) 861-7797

9

10 *Attorneys for Plaintiff*

11 *Calvin Love*

12 CALVIN LOVE, individually and on
13 behalf of all others similarly situated,

14 Plaintiff,

15 v.

16 FILTERBABY LLC, a Maryland
17 limited liability company; and DOES
1 to 10, inclusive,

18 Defendants.

19 Case No. 2:25-cv-03534-SVW-PD

20 **VOLUNTARY DISMISSAL**

21 Judge: Hon. Stephen V. Wilson

22 Complaint Filed: April 22, 2025

1 Plaintiff Calvin Love (“Plaintiff”) acting through counsel, and pursuant to
2 Federal Rule of Civil Procedure 41(a)(1)(A)(i), hereby dismisses this action with
3 prejudice, including all claims against all parties, with each party to bear its own
4 attorneys’ fees and costs. *See* Fed. R. Civ. P. 41(a)(1)(A)(i).

5 In addition, there has been no motion for class certification filed in this
6 action, thus no class has been certified, and it is not necessary to provide notice to
7 the absent putative class members. *See* Judge Virginia A. Phillips, et al., Federal
8 Civil Procedure Before Trial, Calif. & 9th Cir. Editions § 10:790 (The Rutter Group
9 2021) (“There is no requirement of judicial approval for precertification
10 dispositions. The reason is that absent class members generally have no notice of
11 uncertified class actions and therefore cannot be bound or deemed to have relied
12 thereon.”) (citing Adv. Comm. Notes to 2003 Amendments to Fed. R. Civ. P. 23).

13 DATED: July 29, 2025

Respectfully submitted,

14 **KJC LAW GROUP, A.P.C.**

15 By: /s/ Kevin J. Cole

16 Attorneys for Plaintiff
17 *Calvin Love*

18

19

20

21

22

23

24

25

26

27

28

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served the foregoing document on all parties of record
3 via the Court's CM/ECF system.

4 DATED: July 29, 2025

Respectfully submitted,

5 **KJC LAW GROUP, A.P.C.**

6 By: /s/ Kevin J. Cole

7 Attorneys for Plaintiff
8 *Calvin Love*

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28