

DECHERT LLP

William P. Donovan, Jr. (SBN 155881)

bill.donovan@dechert.com

Allison K. Ozurovich (SBN 312797)

allie.ozurovich@dechert.com

633 W. 5th Street, Suite 4900

Los Angeles, CA 90071

Telephone: (213) 808-5700

Facsimile: (213) 808-5760

Attorneys for Defendant Alcon Laboratories, Inc.

Additional Counsel listed below

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

SARAH SOM-DOTSON, individually,
and on behalf of others similarly situated,

Plaintiff,

v.

ALCON LABORATORIES, INC.

Defendant.

Case No. 2:26-cv-04898-MWC-
RAO

**STIPULATION OF
DISMISSAL PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 41(a)(1)(A)(ii)**

Am. Complaint: May 20, 2026
Trial Date: None Set

1 TO THE COURT, CLERK, AND ALL PARTIES OF RECORD, please take
2 notice that Plaintiff Sarah Som-Dotson and Defendant Alcon Laboratories, Inc.
3 hereby stipulate under Federal Rule of Civil Procedure 41(a)(1)(A)(ii) to dismiss
4 *with prejudice* Plaintiff's individual claims, and to dismiss *without prejudice* the
5 putative class claims.

6
7
8 Dated: July 1, 2026

Respectfully submitted,
DECHERT LLP

9
10 By: /s/ William P. Donovan, Jr.

11 William P. Donovan, Jr. (SBN 155881)
12 bill.donovan@dechert.com
13 Allison K. Ozurovich (SBN 312797)
14 allie.ozurovich@dechert.com
15 633 W. 5th Street, Suite 4900
16 Los Angeles, CA 90071
17 Telephone: (213) 808-5700
18 Facsimile: (213) 808-5760

19 Mara Cusker Gonzalez
20 (admitted *pro hac vice*)
21 maracusker.gonzalez@dechert.com
22 Three Bryant Park
23 1095 Avenue of the Americas
24 New York, New York 10036
25 Telephone: (212) 698-3500
26 Facsimile: (212) 698-3599

27 *Attorneys for Defendant Alcon*
28 *Laboratories, Inc.*

1 Dated: July 1, 2026

2 Respectfully submitted,
3 LAW OFFICES OF TODD M.
4 FRIEDMAN, P.C.

5 By: /s/ Todd M. Friedman

6 Todd M. Friedman (SBN 216752)
7 tfriedman@toddfllaw.com
8 Adrian R. Bacon (SBN 280332)
9 abacon@toddfllaw.com
10 23586 Calabasas Rd., Suite 105
11 Calabasas, CA 91302
12 Phone: 323-306-4234

13 *Attorneys for Plaintiff Sarah Som-*
14 *Dotson*

PROOF OF SERVICE

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Los Angeles, State of California, and not a party to the above-entitled cause. On July 1, 2026, I served a true copy of the Stipulation of Dismissal on all counsel of record via the ECF Filing System:

Executed on July 1, 2026.

☒ I hereby certify that I am a member of the Bar of the United States District Court, Central District of California.

☐ I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

☒ I hereby certify under the penalty of perjury that the foregoing is true and correct.

By: /s/ Todd M. Friedman
Todd M. Friedman, Esq.
Attorney for Plaintiff

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

SARAH SOM-DOTSON, individually,
and on behalf of others similarly situated,

Plaintiff,

v.

ALCON LABORATORIES, INC.

Defendant.

Case No. 2:26-cv-04898-MWC-
RAO

**[PROPOSED] ORDER
REGARDING STIPULATION
OF DISMISSAL PURSUANT
TO FEDERAL RULE OF
CIVIL PROCEDURE
41(a)(1)(A)(ii)**

[PROPOSED] ORDER

WHEREAS, the Court, having reviewed Plaintiff Sarah Som-Dotson's and Defendant Alcon Laboratories, Inc.'s Stipulation of Dismissal Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), hereby ORDERS as follows:

Plaintiff's individual claims are dismissed with prejudice, and the putative class claims are dismissed without prejudice.

IT IS SO ORDERED.

DATED: _____

Honorable Michelle Williams
United States District Judge