

1 Annick M. Persinger (CA Bar No. 272996)
 2 *apersinger@tzlegal.com*
 3 Wesley M. Griffith (CA Bar No. 286390)
 4 *wgriffith@tzlegal.com*
 5 **TYCKO & ZAVAREEI LLP**
 1970 Broadway, Suite 1070
 4 Oakland, California 94612
 Telephone: (510) 254-6808
 5 Facsimile: (202) 973-0950

6 Ryan J. Clarkson (CA Bar No. 257074)
rclarkson@clarksonlawfirm.com
 7 Katherine A. Bruce (CA Bar No. 288694)
kbruce@clarksonlawfirm.com
 8 Kelsey J. Elling (CA Bar No. 337915)
kelling@clarksonlawfirm.com
 9 **CLARKSON LAW FIRM, P.C.**
 22525 Pacific Coast Highway
 10 Malibu, California 90265
 Telephone: (213) 788-4050
 11 Facsimile (213) 788-4070

12 ***Attorneys for Plaintiffs***
 13 *[Additional Counsel on Signature Pages]*

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

15 RAUL PIZANA, MAUREEN HOBBS,
 16 CHARLES BERGLUND, JEANETTE MILLS,
 17 ERICA LAROCHE, ANNE MARIE LYNCH,
 OSKAR LAFFONT, SAL MUNOZ, and KEITH
 18 BARNES, *individually and on behalf of all*
others similarly situated,

Case No.: 1:18-cv-00644-ADA-SKO
 Case Filed: May 9, 2018
 FAC Filed: June 30, 2018
 SAC Filed: November 13, 2019
 TAC Filed: May 18, 2022

19 Plaintiffs,

*Assigned to United States District Court
 Judge Ana de Alba and Magistrate Judge
 Shelia K. Oberto*

20 v.

21 BASIC RESEARCH, LLC; BR COS LLC;
 22 BASIC RESEARCH HOLDINGS, LLC; BASIC
 RESEARCH INTERMEDIATE, LLC; SIERRA
 23 RESEARCH GROUP, LLC; MAJESTIC
 MEDIA, LLC; CRM SPECIALISTS, LLC;
 24 BYDEX MANAGEMENT, LLC; SANMEDICA
 INTERNATIONAL, LLC; LIMITLESS
 25 WORLDWIDE, LLC; NOVEX BIOTECH,
 L.L.C; BODEE GAY; GINA DAINES; HALEY
 26 BLACKETT; KIMM HUMPHRIES; and
 MITCHELL K. FRIEDLANDER,

**JOINT STIPULATION REGARDING
 MOTION PRACTICE RELATED TO
 THE THIRD AMENDED
 COMPLAINT; ORDER**

(Doc. 241)

27 Defendants.

28 **JOINT STIPULATION REGARDING MOTION PRACTICE
 RELATED TO THE THIRD AMENDED COMPLAINT; ORDER**
 CASE No. 1:18-cv-00644-ADA-SKO

1 **JOINT STIPULATION REGARDING MOTION PRACTICE RELATED TO THE**
2 **THIRD AMENDED COMPLAINT**

3 Plaintiffs Raul Pizana, Maureen Hobbs, Charles Berglund, Jeanette Mills, Erica LaRoche,
4 Anne Marie Lynch, Oskar Laffont, Sal Munoz, and Keith Barnes (collectively, “Plaintiffs”) and
5 Limitless Worldwide, LLC, through their respective counsel of record, hereby stipulate and agree
6 as follows:

7 Whereas the Court has set a briefing schedule for various motions to dismiss, strike, and/or
8 transfer (ECF Nos. 217, 218, 220, 221, 222, 224-1, 230, 231) the Third Amended Complaint
9 (“TAC”) such that Plaintiffs’ oppositions to Defendants’ motions are due on or before October 21,
10 2022; and Defendants’ replies are due on or before November 18, 2022. (ECF No. 206.)

11 Whereas Limitless filed a Notice of Joinder in specified portions of the motions to dismiss
12 filed by certain other Defendants on September 1, 2022. (ECF No. 234.)

13 Whereas Limitless filed a Motion for Judgment on the Pleadings regarding the TAC on
14 September 2, 2022. (ECF No. 237.)

15 Whereas on September 6, 2022, this Court issued an order that Limitless’s Motion for
16 Judgment on the Pleadings will be decided on the papers. (ECF No. 238.)

17 Whereas in order to promote the efficient advancement of this action, Plaintiffs and
18 Limitless agree that briefing on Limitless’ Notice of Joinder (ECF No. 234) and Motion for
19 Judgment on the Pleadings (ECF No. 237) should be set to match the briefing schedule for the
20 other Defendants’ motions related to the TAC—i.e., Plaintiffs’ oppositions due on October 21,
21 2022, and Defendants’ replies due on November 18, 2022.

22 Whereas this stipulated schedule does not impact any other parties other than Plaintiffs and
23 Limitless.

24 Whereas as the parties expressly reserve all rights and preserve all arguments with regard
25 to the anticipated motion practice.

26 Whereas this stipulation is entered into in good faith and not for purposes of delay.

1 **WHEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:**

- 2 • Plaintiffs' opposition to Limitless's Notice of Joinder and Motion for Judgment on the
3 Pleadings shall be filed on or before October 21, 2022.
- 4 • Limitless's reply in support of Motion for Judgment on the pleadings shall be filed by
5 November 18, 2022.
- 6 • The parties expressly reserve all rights and preserve all arguments with regard to the
7 anticipated motion practice.

8 Dated: September 9, 2022

Katherine A. Bruce

Ryan J. Clarkson (CA Bar No. 257074)
rclarkson@clarksonlawfirm.com
Katherine A. Bruce (CA Bar No. 288694)
kbruce@clarksonlawfirm.com
Kelsey J. Elling (CA Bar No. 337915)
kelling@clarksonlawfirm.com
CLARKSON LAW FIRM, P.C.
22525 Pacific Coast Highway
Malibu, California 90265
Telephone: (213) 788-4050
Facsimile (213) 788-4070

15 Wesley M. Griffith (CA Bar No. 286390)
wgriffith@tzlegal.com
16 Annick M. Persinger (CA Bar No. 272996)
apersinger@tzlegal.com
17 **TYCKO & ZAVAREEI LLP**
18 1970 Broadway, Suite 1070
Oakland, California 94612
Telephone: (510) 254-6808
19 Facsimile: (202) 973-0900

20 *Attorneys for Plaintiffs*

21
22 Dated: September 9, 2022

/s/ Chad Nydegger (as authorized on Sept. 9, 2022)

23 Chad Nydegger**
cnydegger@wnlaw.com
24 **WORKMAN NYDEGGER**
25 60 East South Temple, Suite 1000
Salt Lake City, Utah 84111
Telephone: (801) 533-9800
26 Facsimile: (801) 328-1707

27 *Attorney for Defendant Limitless Worldwide,*
28 **LLC**

1 **ORDER**

2 **Based on the foregoing stipulation of the parties (Doc. 241) and good cause appearing,**

3 **IT IS HEREBY ORDERED:**

- 4 • Plaintiffs' opposition to Limitless Worldwide, LLC's Notice of Joinder and Motion for
5 Judgment on the Pleadings shall be filed on or before October 21, 2022.
- 6 • Limitless Worldwide, LLC's reply in support of its Motion for Judgment on the
7 pleadings shall be filed by November 18, 2022.

8
9
10 IT IS SO ORDERED.

11 Dated: September 12, 2022

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE