

1 Michael P. Esser (SBN 268634)  
Michael.esser@kirkland.com  
2 **KIRKLAND & ELLIS LLP**  
555 California Street  
3 San Francisco, California 94104  
Telephone: (415) 439-1400  
4 Facsimile: (415) 439-1500

5 Jay P. Lefkowitz, P.C. (admitted *pro hac vice*)  
lefkowitz@kirkland.com  
6 Ross L. Weiner (admitted *pro hac vice*)  
ross.weiner@kirkland.com  
7 **KIRKLAND & ELLIS LLP**  
601 Lexington Avenue  
8 New York, N.Y. 10022  
Telephone: (212) 446-4800  
9 Facsimile: (212) 446-4900

10 *Attorneys for Defendant*  
CONOPCO, INC. D/B/A UNILEVER

Alan R. Plutzik (State Bar No. 77785)  
Michael S. Strimling (State Bar No. 96135)  
**BRAMSON, PLUTZIK, MAHLER  
& BIRKHAUSER LLP**  
2125 Oak Grove Road  
Walnut Creek, CA 94598  
Telephone: (925) 945-0200  
Facsimile: (925) 945-8792  
aplutzik@bramsonplutzik.com  
mstrimling@bramsonplutzik.com

Mark P. Kindall (State Bar No. 138703)  
Robert A. IZARD (admitted *pro hac vice*)  
**IZARD, KINDALL & RAABE, LLP**  
29 South Main Street, Suite 305  
West Hartford, CT 06107  
Telephone: (860) 493-6292  
Facsimile: (860) 493-6290  
mkindall@ikrlaw.com  
rizard@ikrlaw.com

*Attorneys for Plaintiffs*  
[Additional Counsel on Signature Page]

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15 **UNITED STATES DISTRICT COURT**  
16 **EASTERN DISTRICT OF CALIFORNIA**  
17

18 ALBA MORALES; LAINIE COHEN; LINDA )  
CLAYMAN; and KENNETH DREW, on behalf of )  
19 themselves and others similarly situated, )

20 Plaintiffs, )

21 vs. )

22 CONOPCO, INC., d/b/a UNILEVER, )

23 Defendant. )  
24 )

CIV. NO. 2:13-cv-2213 WBS EFB  
STIPULATION AND [PROPOSED]  
MODIFIED SCHEDULING ORDER

25 The parties in the above-captioned matter, by and through their designated counsel, jointly  
26 move the Court to approve the following modifications to the July 12, 2016 scheduling order [ECF  
27 No. 63] relating to the October 17, 2016 final approval hearing on the proposed Class Action  
28 Settlement. The Parties do not propose a change to the Final Approval Hearing date. However,

1 because the Notice Plan includes a multi-week media campaign, the Parties request leave to change  
2 some of the other deadlines relating to notice, opting out, briefing and filing a claim.

3 Specifically, Plaintiffs request that the media campaign described in the Notice Plan  
4 commence no later than August 1, 2016 and conclude by August 30, 2016. Plaintiffs will file  
5 motions for final approval and for approval of an award of attorneys' fees, expenses and for approval  
6 of lead plaintiff awards by no later than September 12, 2016. The deadline for Class Members to file  
7 objections or requests to opt out of the Settlement would be September 30, 2016. Plaintiffs would  
8 file any response to objections, together with a final report on the effectuation of the notice plan, by  
9 October 7, 2016. Finally, the deadline for Class Members to file claim forms would be five business  
10 days after the October 17, 2016 Final Approval Hearing: October 24, 2017. This schedule will  
11 permit adequate time to complete the Notice Plan and provide Class Members with a minimum of  
12 four weeks after receiving notice to decide whether to object or opt out of the Settlement. It will also  
13 give Class Members access to Plaintiffs' final approval brief and their submission relating to fees  
14 and expenses well before the deadline for filing objections or requests to opt out. Finally, Class  
15 Members can – if they choose – wait to see whether the Court approves the Settlement before filing  
16 claims.

17 Based on the foregoing, the Parties suggest modifying the schedule set forth in the July 12,  
18 2016 Order [ECF No. 63] as follows:

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Event	Current Deadlines	Proposed Amended Deadlines
Publication Notice	August 11, 2016	Media campaign to begin by August 1, 2016 and be completed by August 30, 2016
Deadline for Plaintiffs to file motions and supporting papers on Final Approval, attorneys' fees and expenses, and lead plaintiff awards	September 12, 2016	September 12, 2016 (no change)
Deadline for Class Members to file objections or submit requests to opt out of the Settlement	September 19, 2016	September 29, 2016

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1 2 3	Deadline to file reply (if any) in support of Final Approval Motion and/or motion for award of attorneys' fees and expenses and lead plaintiff awards	Not listed	October 7, 2016
4	Final Approval Hearing	October 17, 2016	October 17, 2016 (No change)
5 6	Deadline for Class Members to file Claim Forms	September 19, 2016	October 24, 2016

7 DATED: July 13, 2016

8  
9 By: /s/ Michael P. Esser  
Michael P. Esser (SBN 268634)  
10 Michael.esser@kirkland.com  
KIRKLAND & ELLIS LLP  
11 555 California Street, 27th Floor  
San Francisco, California 94104  
12 Telephone: (415) 439-1400  
Facsimile: (415) 439-1500

13 Jay P. Lefkowitz, P.C. (admitted *pro hac vice*)  
14 lefkowitz@kirkland.com  
15 Ross L. Weiner (admitted *pro hac vice*)  
ross.weiner@kirkland.com  
16 KIRKLAND & ELLIS LLP  
601 Lexington Avenue  
17 New York, New York 10022  
Telephone: (212) 446-4800  
18 Facsimile: (212) 446-4900

19 Attorneys for Defendant  
CONOPCO, INC. D/B/A UNILEVER

By: /s/ Mark P. Kindall  
Mark P. Kindall (State Bar No. 138703)  
Robert A. Izard (admitted *pro hac vice*)  
IZARD, KINDALL & RAABE, LLP  
29 South Main Street, Suite 305  
West Hartford, CT 06107  
Telephone: (860) 493-6292  
Facsimile: (860) 493-6290  
mkindall@ikrlaw.com  
rizard@ikrlaw.com

Alan R. Plutzik (State Bar No. 77785)  
BRAMSON, PLUTZIK, MAHLER  
& BIRKHAUSER LLP  
2125 Oak Grove Road  
Walnut Creek, CA 94598  
Telephone: (925) 945-0200  
Facsimile: (925) 945-8792  
aplutzik@bramsonplutzik.com

Nicole A. Venno (admitted *pro hac vice*)  
LAW OFFICE OF NICOLE A. VENNO, LLC  
573 Hopmeadow Street  
Simsbury, CT 06070  
Telephone: (860) 474-4024  
Facsimile: (860) 717-3207  
nvenno@venolaw.com

Joseph J. DePalma (admitted *pro hac vice*)  
Katrina Carroll (admitted *pro hac vice*)  
LITE DEPALMA GREENBERG, LLC  
Two Gateway Center, 12th Floor  
Newark, New Jersey 07102  
Telephone: (973) 623-3000  
Facsimile: (973) 623-0858  
jdepalma@litedepalma.com  
kcarroll@litedepalma.com

Attorneys for Plaintiffs

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**ORDER**

THE PARTIES HEREBY AGREE AND STIPULATE to, and submit that, good cause is shown to support the following Fifth Modified Scheduling Order.

Accordingly, the Court HEREBY ORDERS that:

1. The parties' stipulation to modify the July 12, 2016 scheduling order [ECF No. 63] is

GRANTED; and the Order is modified as follows:

- (i) Plaintiffs shall direct the Notice Administrator to commence the media campaign described in the Notice Plan submitted in support of the Motion for Preliminary Approval by no later than August 1, 2016, and complete it by no later than August 30, 2016;
- (ii) Plaintiffs shall file a motion for final approval of the Settlement, together with supporting papers, by no later than September 12, 2016;
- (iii) Plaintiffs shall file any motion for approval of an award of attorneys' fees and expenses, as well as any motion for lead plaintiff awards, by no later than September 12, 2016;
- (iv) Class members shall file any objections to the Settlement, the Plan of Allocation, and/or Plaintiffs' requests for an award of attorneys' fees and expenses and lead plaintiff awards, by no later than September 29, 2016;
- (v) Class members shall file any requests for exclusion by no later than September 29, 2016;
- (vi) Responses to any objections or requests for exclusion shall be filed by no later than October 7, 2016, together with a final report on effectuation of the Notice Plan.
- (vii) The Final Approval Hearing shall take place as scheduled on October 17, 2016, at 1:30 p.m.
- (viii) Class members who wish to receive a portion of the Settlement fund shall file claim forms by no later than October 24, 2016.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: July 13, 2016



WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE

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2 **CERTIFICATE OF SERVICE**

3 The undersigned hereby certifies that all counsel of record who have consented to electronic  
4 service are being served with a copy of the attached **Stipulation and [Proposed] Modified**  
5 **Scheduling Order** via the CM/ECF system on July 13, 2016.

6 DATED: July 13, 2016

7 /s/ Mark P. Kindall  
8 Mark P. Kindall  
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