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12 Attorneys for Plaintiffs,
 13 **HYEJIN LEE, RUIQI YE, YOLIN HAN**

14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**

16 HYEJIN LEE, RUIQI YE and YOLIN
 17 HAN, individually and on behalf of all
 18 other similarly-situated individuals,
 Plaintiffs,

Case No.: 3:14-cv-05237(EMC)

19 v.

20 SEPHORA USA, INC. and LVMH MOET
 21 HENNESSY LOUIS VUITTON, INC.,
 22 Defendants.

23 **STIPULATION AND PROPOSED ORDER DISMISSING**
 24 **DEFENDANT LVMH MOET HENNESSY LOUIS VUITTON, INC.**

28 *Lee et al. v. Sephora USA, Inc., et al.*

Stipulation and Proposed Order
 Case No. 3:14-cv-05237-EMC

1 It is hereby stipulated, by and between Plaintiffs Hyejin Lee, Ruiqi Ye and Yolin Han
2 and Defendants Sephora USA, Inc. (“Sephora”) and LVMH Moet Hennessy Louis Vuitton, Inc.
3 (“LVMH Inc.”):

4 1. The parties agree to the dismissal, without prejudice, of LVMH Inc. as a
5 Defendant in this action.

6 2. If LVMH Inc. is renamed as a party, this Stipulation shall be deemed null and
7 void. If LVMH Inc. is renamed as a party, however, LVMH Inc. retains all rights to bring an
8 appropriate motion to dismiss, motion for summary judgment, and/or motion for sanctions, to the
9 extent it determines such a motion is appropriate.
10

11 3. Defendants agree that they will not make a motion for or otherwise seek costs,
12 fees, sanctions or any other similar relief related to the naming of LVMH Inc. as a Defendant in
13 the initial Complaint in this action. If LVMH Inc. is renamed as a party in a future pleading,
14 however, LVMH Inc. retains all rights to bring an appropriate motion for sanctions against
15 plaintiffs for renaming it, to the extent it determines such a motion is appropriate.
16

17 Dated: March 19, 2015
18 San Francisco, CA

19 Respectfully submitted,

20 YUHL CARR LLP

21 By: /s/ Colin A. Yuhl

22 Colin A. Yuhl

23 Eric F. Yuhl

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

HYEJIN LEE, RUIQI YE and YOLIN
HAN, individually and on behalf of all
other similarly-situated individuals,
Plaintiffs,

v.

SEPHORA USA, INC. and LVMH MOET
HENNESSY LOUIS VUITTON, INC.,
Defendants.

Case No.: 3:14-cv-05237(EMC)

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that Defendant LVMH Moet
Hennessy Louis Vuitton, Inc. is dismissed as a defendant in this action without prejudice.

Date: March ²³ __, 2015

Hon. Edward M. Chen
United States District Court Judge
Northern District of California

