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*Attorneys for Defendants Colgate-Palmolive Company and Tom's of Maine, Inc.*

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

YOLANDA PITRE, individually, and on behalf of all others similarly situated,

Plaintiffs,

V.

COLGATE-PALMOLIVE COMPANY and  
TOM'S OF MAINE, INC.,

## Defendants.

Case No. 3:24-cv-09318-CBR

**STIPULATION AND [PROPOSED]  
ORDER OF DISMISSAL WITHOUT  
PREJUDICE PURSUANT TO FED. R.  
CIV. P. 41(a)(1)(A)(ii)**

Complaint Filed: December 20, 2024  
Trial Date: Not Yet Set

## **STIPULATION OF DISMISSAL**

Plaintiff YOLANDA PITRE (“Plaintiff”) and Defendants COLGATE-PALMOLIVE COMPANY and TOM’S OF MAINE, INC. (“Defendants”) (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

1. **Dismissal.** Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the Parties stipulate that this action is dismissed in its entirety, without prejudice.
  2. **Fees and Costs.** Each Party shall bear its own attorneys' fees and costs.
  3. **Rule 23(e).** No class has been certified in this action, and the Parties are not seeking approval of any settlement, compromise, or voluntary dismissal of the claims of a certified class (or a class proposed to be certified for settlement purposes).
  4. **Related Proceeding.** Plaintiff has filed a consolidated class action complaint with other plaintiffs in United States District Court, Eastern District of New York, entitled *Rabinowitz, et al. v. Colgate-Palmolive Company*, Case No. 2:25-CV-06996 (JMW) and the Parties enter this stipulation to avoid duplicative litigation.

Dated: December 29, 2025

## WILSHIRE LAW FIRM, PLC

By: /s/ *Thiago Coelho*

Thiago Coelho, Esq.  
Chumahan B. Bowen, Esq.  
Jennifer M. Leinbach, Esq.

*Attorneys for Plaintiff*

Dated: December 29, 2025

## O'MELVENY & MYERS LLP

By: /s/ *Hannah Y. Chanoine*

Matthew D. Powers, Esq.  
Hannah Y. Chanoine, Esq.  
Nexus U. Sea, Esq.

*Attorneys for Defendants*

**ATTESTATION OF FILING**

Pursuant to Local Rule 5.1(i)(3) regarding signatures, I, Thiago Coelho, attest that concurrence in this filing has been obtained from Hannah Y. Chanoine, Esq.

Dated: December 29, 2025

## **WILSHIRE LAW FIRM, PLC**

By: /s/ Thiago Coelho

Thiago Coelho, Esq.

## **[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: January 2, 2026

  
Hon. Charles R. Breyer  
United States District Judge