

1 SCHIFF HARDIN LLP
 Jeffrey R. Williams (Bar No. 84156)
 2 jrwilliams@schiffhardin.com
 Rocky N. Unruh (Bar No. Bar No. 84049)
 3 runruh@schiffhardin.com
 Sarah D. Youngblood (Bar No. 244304)
 4 syoungblood@schiffhardin.com
 One Market, Spear Street Tower
 5 Thirty-Second Floor
 San Francisco, CA 94105
 6 Telephone: (415) 901-8700
 Facsimile: (415) 901-8701
 7

8 Attorneys for Defendants
 UNILEVER UNITED STATES, INC. and
 CONOPCO, INC. d/b/a UNILEVER HOME &
 9 PERSONAL CARE USA

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION
 13

14 JOSEPHINE WELLS and CATHERINE
 15 RENY, on Behalf of Themselves and All
 Others Similarly Situated,

16 Plaintiffs,

17 v.

18 UNILEVER UNITED STATES, INC.,
 19 LEK INC., and CONOPCO, INC. d/b/a
 UNILEVER HOME & PERSONAL
 20 CARE USA,

21 Defendants.

Case No. 3:13-CV-04749-EDL

**STIPULATION AND ORDER
 EXTENDING STAY OF PROCEEDINGS**

Local Rules 7-1(5) and 7-12

22
 23 Pursuant to Civil L.R. 7-1(5) and 7-12, plaintiffs Josephine Wells and Catherine Reny
 24 (“Plaintiffs”) and defendants Unilever United States, Inc. and Conopco, Inc. (“Unilever”), by
 25 their respective counsel, stipulate and agree as follows:¹
 26

27
 28 ¹ Defendant LEK, Inc. has not yet been served with process, and is therefore not an “affected party” whose signature is required under Civil L.R. 7-12.

1 1. Plaintiffs in this case assert a variety of claims relating to a hair care product, the
2 Suave Professionals Keratin Infusion 30 Day Smoothing Kit (the “Product”). Plaintiffs’
3 Complaint (Dkt. # 1) asserts claims for breach of warranty, violation of consumer protection
4 statutes, false advertising, unjust enrichment, strict product liability and negligence/gross
5 negligence on behalf of (a) a putative class consisting of all persons who purchased the Product in
6 any state other than Alabama, Illinois, Kentucky, Nevada and Wisconsin or, in the alternative, (b)
7 all persons who purchased the Product in the state of California. Plaintiffs’ counsel have also
8 filed two other putative class actions alleging virtually identical claims: *Reid v. Unilever United*
9 *States, Inc.*, N.D. Ill. Case No. 12-cv-6058, alleging claims on behalf of residents of Alabama,
10 Illinois, Nevada and Wisconsin; and *Naiser v. Unilever United States, Inc.*, W.D. Ky. Case No.
11 13-cv-395, alleging claims on behalf of residents of Kentucky.

12 2. On November 25, 2013, the Parties filed a Stipulation and Proposed Order (Dkt.
13 #14) to stay all proceedings in this case until January 14, 2013 while the Parties attempted to
14 resolve all three cases through mediation. On November 26, 2013, this Court entered an Order
15 (Dkt. #15) granting the Parties’ Stipulation and staying all proceedings until January 14, 2013.

16 3. On November 22, 2013, the Parties participated in a mediation that resulted in a
17 signed term sheet regarding the core terms of a settlement.

18 4. On December 12, 2013, the Parties appeared for a status hearing in the *Reid* case.
19 Following that hearing, the judge presiding over the *Reid* case entered an order directing the
20 Parties to submit their joint motion for preliminary approval of the settlement to him by January
21 31, 2014 and extending the previously entered stay of proceedings in that case to February 13,
22 2014.

23 5. The Parties have agreed that the statutes of limitations applicable to any claims
24 relating to the Product of any persons who purchased or used the Product in the United States
25 from the date in 2011 that it was first made available to consumers through the present will be
26 tolled during the pendency of the requested stay period.

27 IT IS THEREFORE STIPULATED AND AGREED and the Parties respectfully request
28 through this application that the Court enter an order extending the previously entered stay of

1 proceedings in this matter, including all discovery, to February 13, 2014, deferring all deadlines
2 set forth in the Court's October 16, 2013 Order Setting Initial Case Management Conference and
3 ADR Deadlines (Dkt. #4), and vacating the Case Management Conference that is currently
4 scheduled for January 23, 2014 at 2:45 p.m.

5 Dated: December 27, 2013

SCHIFF HARDIN LLP

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7 By: /s/ Jeffrey R. Williams

8 Jeffrey R. Williams
9 jwilliams@schiffhardin.com
10 Rocky N. Unruh
11 runruh@schiffhardin.com
12 Sarah D. Youngblood
13 syoungblood@schiffhardin.com
14 One Market
15 Spear Street Tower, Thirty-Second Floor
16 San Francisco, CA 94105
17 (415) 901-8700

18 COUNSEL FOR DEFENDANTS
19 UNILEVER UNITED STATES, INC.
20 AND CONOPCO, INC.

21 Dated: December 27, 2013

THE MEHDI FIRM, PC

22 By: /s/ Azra Z. Mehdi

23 Azra Z. Mehdi (SBN 220406)
24 azram@themehdifirm.com
25 One Market
26 Spear Tower, Suite 3600
27 San Francisco, CA 94105
28 (415) 293-8039

COUNSEL FOR PLAINTIFFS

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I attest and certify that I received permission from plaintiffs' counsel before e-filing this document and will retain proof of this permission.

Dated: December 27, 2013

SCHIFF HARDIN LLP

By: /s/ Jeffrey R. Williams
Jeffrey R. Williams
jwilliams@schiffhardin.com
Rocky N. Unruh
runruh@schiffhardin.com
Sarah D. Youngblood
syounblood@schiffhardin.com
One Market
Spear Street Tower, Thirty-Second Floor
San Francisco, CA 94105
(415) 901-8700

COUNSEL FOR DEFENDANTS
UNILEVER UNITED STATES, INC.
AND CONOPCO, INC.

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**PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, THE
COURT ENTERS THE FOLLOWING ORDER:**

All proceedings in this matter, including all discovery, are hereby stayed until February 13, 2014, all deadlines set forth in the Court's October 16, 2013 Order Setting Initial Case Management Conference and ADR Deadlines (Dkt. #4) are hereby deferred, and the Case Management Conference that is currently scheduled for January 23, 2014 at 2:45 p.m. is vacated.

Dated: December 30, 2013


SAUNDRA BROWN ARMSTRONG
UNITED STATES DISTRICT JUDGE