

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

ROBYN LIPETZ and SHANNON
KEENER, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

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

Defendants.

Case No.: 2:20-cv-06350-CFK

**CONSENT ORDER TRANSFERRING ACTION
TO THE NORTHERN DISTRICT OF ILLINOIS**

THIS MATTER having been presented to the Court through the undersigned counsel upon the consent of Plaintiffs Robyn Lipetz and Shannon Keener (collectively, “Plaintiffs”) and Defendants Unilever United States, Inc. and Conopco, Inc. d/b/a Unilever Home & Personal Care USA (collectively, “Defendants,” and together with Plaintiffs, the “Parties”):

WHEREAS, Plaintiffs filed the above-captioned action (this “Action”) on December 17, 2020;

WHEREAS, substantially similar actions have been filed in other jurisdictions, specifically: (i) *Castillo v. Unilever United States, Inc., et al.*, No. 1:20-cv-06786, filed on November 16, 2020, in the United States District Court for the Northern District of Illinois (the “First-Filed Action”); (ii) *Libbey v. Unilever United States, Inc., et al.*, No. 4:20-cv-08075-JSW, filed on November 16, 2020, in the United States District Court for the Northern District of California; and (iii) *Arroyo v. Unilever United States, Inc., et al.*, No. 2:21-cv-00302, filed on

January 7, 2021, in the United States District Court for the District of New Jersey (collectively, the “Related Actions”);

WHEREAS, the Plaintiffs in this Action and the plaintiffs in the Related Actions are represented by overlapping counsel;

WHEREAS, this Action and the Related Actions involve the same Defendants and are asserted on behalf of nationwide putative classes of purchasers of the same products manufactured by Defendant Unilever United States, Inc.;

WHEREAS, this Action and the Related Actions involve substantially similar issues of fact and law;

WHEREAS, litigating this Action and the Related Actions in separate jurisdictions would be inefficient and present the risk of inconsistent results, and would be inconvenient to the Parties and witnesses alike;

WHEREAS, having this Action and the Related Actions proceed before the same Court will eliminate the potential for inconsistent rulings on critical pretrial motions, including class certification, eliminate the burden of duplicative discovery on common issues, prevent unnecessary use of judicial resources, and reduce the overall costs and burdens for all parties;

WHEREAS, the Parties jointly seek to transfer this Action to the United States District Court for the Northern District of Illinois, the jurisdiction in which the First-Filed Action was filed, which would serve the convenience of the Parties and witnesses, and the interests of justice, as contemplated by 28 U.S.C. § 1404(a);

WHEREAS, the parties to the Related Actions have agreed to consolidation in the Northern District of Illinois, where Plaintiffs have agreed to file a consolidated amended complaint to supersede the Complaint in this Action and the Complaints in the Related Actions,

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