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July 27, 2023

VIA ECF

Hon. David C. Godbey, U.S.D.J.
United States District Court
Northern District of Texas (Dallas)
1100 Commerce St
Dallas, Texas 75242

Re: *Campbell et al v. Kimberly-Clark Corporation*
Case No. 22-cv-02717

Hon. Judge Godbey:

We write to inform the Court that Plaintiffs' Counsel has reached a settlement of this matter and as such, have simultaneously filed with this letter a Notice of Dismissal, with prejudice, pursuant to Fed. R. Civ. P. 41(a)(2). Although the terms of the settlement are confidential and while Court-approval is not required, Plaintiffs' Counsel can represent that they believe the non-class settlement reached provides a fair and just resolution of the claims in the subject action.

Although we are dismissing claims for all Plaintiffs, we currently no longer represent Ms. Dionese. While we represented her at the mediation on June 12, 2023 (presided over by David Forkner, a consumer fraud specialist who is a senior litigation partner at Williams & Connolly LLP, D.C office) and had authority to enter into a binding resolution on her behalf, she subsequently terminated my representation.

While we may have an unresolved post-settlement dispute with Ms. Dionise, such dispute is subject to arbitration pursuant to her retainer agreement and should not affect the dismissal of this action.

We thank the Court for its kind consideration and respectfully request the Court to enter the dismissal so as not to delay the litigation and settlement with respect to the other 7 claimants, for whom a dispute does not exist.

Respectfully,

/s/ C.K. Lee

C.K. Lee, Esq.

cc: all parties via ECF