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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
UNLIMITED JURISDICTION**

FILED
Superior Court of California
County of Los Angeles
JUL 15 2026
David W. Slayton, Executive Officer/Clerk of Court
By: T. Lewis, Deputy

VICTOR GUZMAN, PERRY BRUNO,
LAUREN FLEMING, DAVID PLOWDEN,
KAREN BETZAG, and JAIME
NAPOLITANO, individually, and on behalf
of all others similarly situated,

Plaintiff,

vs.

DR. SQUATCH, LLC

Defendant.

Case No.: 25STCV03523

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: **JULY 15 2026**
Time: **11:00 a.m.**
Dept.: **11**

1 TO ALL PARTIES AND THEIR RESPECTIVE COUNSEL:

2 The Motion for Preliminary Approval of Class Action Settlement came before this
3 Court, on ~~December 9, 2025~~ ^{July 15, 2026 at 11:00am} at 9:00 a.m. The Court having considered the papers submitted
4 in support of the Motion, HEREBY ORDERS THE FOLLOWING:

5 1. Capitalized terms shall have the definitions set forth in the Settlement
6 Agreement and Release of Claims and Rights (the "Settlement") entered into between the
7 Parties.

8 2. The "Settlement Class" shall consist of all Persons who purchased Products in
9 the United States during the Class Period. The Class Period is defined as "November 1, 2018
10 through the date 45 days after entry of this Preliminary Approval Order." Excluded from the
11 Settlement Class are: (a) all Persons who purchased or acquired the Product for resale; (b)
12 Dr. Squatch and all Released Parties; (c) any Person who files a valid, timely Opt-Out
13 request; and (d) the judges to whom this Action is assigned and any members of their
14 immediate families.

15 3. The Settlement Class is conditionally certified for purposes of settlement only.

16 4. The Court grants preliminary approval of the Settlement based upon the terms
17 set forth in the Settlement filed herewith, and finds that the Settlement Class meets the
18 requirements for conditional certification for settlement purposes only under California Code
19 of Civil Procedure section 382.

20 5. The Settlement appears to be fair, adequate and reasonable to the Settlement
21 Class. The Settlement falls within the range of reasonableness and appears to be
22 presumptively valid, subject only to any objections that may be raised in connection with the
23 Final Approval Hearing.

24 6. Plaintiffs Victor Guzman, Perry Bruno, Lauren Fleming, David Plowden,
25 Karen Betzag, and Jaime Napolitano (collectively, the "Named Plaintiffs"), are conditionally
26 approved as the class representatives for the Settlement Class.

27 7. The aggregate Incentive Award of \$40,000.00 payable to Named Plaintiffs for
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1 their services as the class representatives appears fair and reasonable at this time, subject to a
2 more thorough review at Final Approval.

3 8. Plaintiffs' Counsel Adrian R. Bacon of the Law Offices of Todd M. Friedman,
4 P.C. and Michael R. Reese of Reese LLP are conditionally approved as Class Counsel for the
5 Settlement Class.

6 9. The Fee Award of up to one third of the Settlement Amount (as defined in the
7 Settlement), plus actual litigation expenses, payable to Class Counsel from the Settlement
8 Amount appears fair and reasonable at this time, subject to a more thorough review at the
9 Final Approval Hearing, as well as the reaction of Class Members at Final Approval.

10 10. A Final Approval Hearing on the question of whether the Settlement,
11 attorneys' fees and costs to Class Counsel, and Incentive Awards to Plaintiff should be given
12 Final Approval as fair, reasonable and adequate as to Settlement Class Members is scheduled
13 in Department 11 on the date and time set forth in Paragraph 18(i) below.

14 11. The Court hereby appoints Eisner Amper LLP as the Settlement
15 Administrator.

16 12. The Court approves, as to form and content, the Class Notice in substantially
17 the form attached to the Declaration of Adrian Bacon submitted in conjunction with the
18 Motion. The Court approves the procedures for Class Members to participate in, to submit
19 claims forms, to request exclusion from, and to object to the Settlement as set forth in the
20 Class Notice.

21 13. The Court directs Class Notice by email and Publication Notice to all Class
22 Members in accordance with the Implementation Schedule set forth below. The Court finds
23 the dates selected for the mailing and distribution of the Class Notice, as set forth in the
24 Implementation Schedule, meet the requirements of due process and provide the best notice
25 practicable under the circumstances and shall constitute due and sufficient notice to all
26 persons entitled thereto.

27 14. Any Class Member may choose to opt-out of and be excluded from the
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1 Settlement Class, as provided in the Notice, by following the instructions for requesting
2 exclusion from the Settlement Class that are set forth in the Notice. Any and all requests for
3 exclusion must be submitted as provided in the Notice. Any such person opts-out of and is
4 excluded from the Settlement Class will not be entitled to any recovery under the Settlement,
5 will not be bound by the Settlement, and will not have any right to object, appeal, or
6 comment thereon. Any written request to opt-out must be signed by each such person opting
7 out. Class Members who have not requested exclusion shall be bound by all determinations
8 of the Court, the Settlement, and Judgment.

9 15. Any Class Member may appear at the Final Approval Hearing, where they
10 may object or otherwise express the Class Member's views regarding the Settlement, and
11 may present evidence and file briefs or other papers that may be proper and relevant to the
12 issues to be heard and determined by the Court as provided in the Notice. Additionally, any
13 Class Member may submit a written objection as set forth in the Notice.

14 16. The Settlement is not a concession or admission, and shall not be used against
15 or to prejudice Defendant or any of the Released Parties, including as an admission or
16 indication with respect to any claim of fault, wrongdoing or omission. Whether or not the
17 Settlement is finally approved, neither the Settlement, nor any document, statement,
18 proceeding, or conduct related to the Settlement, nor any reports or accounts thereof, shall in
19 any event be:

- 20 a. Construed as, offered or admitted in evidence as, received as or deemed to be
21 evidence for any purpose adverse to the Defendant or any of the other
22 Released Parties, including, but not limited to, as evidence of a presumption,
23 concession, indication, or admission by Defendant or any of the Released
24 Parties of any liability, fault, wrongdoing, omission, concession, or damage;
25 or
26 b. Disclosed, referred to, or offered or received in evidence against any
27 Defendant or any of the other Released Parties in any further proceeding in
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1 the Action, or in any other civil, criminal, or administrative action or
2 proceeding, except for purposes of settling the Action pursuant to the
3 Settlement.

4 17. In the event the Settlement does not become effective in accordance with the
5 terms of the Settlement, or the Settlement is not finally approved, or is terminated, canceled
6 or fails to become effective for any reason, this Order shall be rendered null and void and
7 shall be vacated, and the Parties shall revert to their respective positions as of before entering
8 into the Settlement.

9 18. The Court orders the following Implementation Schedule for further
10 proceedings:

- 11 a. Deadline for Defendant to submit DATE July 30 2026
12 Class List to Settlement
13 Administrator (within 15 days
14 after the Court Granting
Preliminary Approval):
- 15 b. Deadline for Settlement DATE Aug 29 2026
16 Administrator to commence
17 dissemination of the Settlement
18 Notice (the "Notice Date") to
Class Members (within 45 days of
this Order):
- 19 c. Claim Submission Deadline (90 DATE Nov 27 2026
20 days from the Notice Date):
- 21 d. Objection/Exclusion Deadline (45 DATE Oct 13 2026
22 days from the Notice Date):
- 23 e. Deadline for Class Counsel to file DATE JAN 22 2027
24 Motion for Final Approval of
Class Action Settlement:
- 25 f. Deadline for Class Counsel to file DATE SEPT 29 2026
26 Motion for Attorneys' Fees, Costs
and Incentive Award:
- 27 g. Deadline for Settlement DATE
28 ~~JAN 17 2027~~

1 Administrator to Submit
2 Declaration Detailing Claims/Opt
3 Outs/Objections (no later than 7
4 days prior to the Final Approval
5 Hearing):

FEB 23 2027

6 h. Deadline to Submit Any
7 Responses to Objections and/or
8 Reply Brief (no later than 14 days
9 prior to the Final Approval
10 Hearing):

DATE

FEB 16 2027

11 i. Final Approval Hearing Date:

DATE

MARCH 2 2027

10:00 am

12 IT IS SO ORDERED.

13 Dated: July 15, 2026, 2025

14 BY


15 Honorable ~~David S. Cunningham III~~
16 Judge of the Superior Court of the State of
17 California County of Los Angeles

HON. BRUCE G. IWASAKI

18 FOR PLAINTIFFS: Michael Reese *M. Reese*

19 FOR DEFENDANT: AMIT RANA *AR*