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16 *Attorneys for Defendant*

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 18 **IN THE UNITED STATES DISTRICT COURT**
 19 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

20 MOCHA GUNARATNA and RENEE
 21 CAMENFORTE, individually and on
 22 behalf of all others similarly situated,

23 **Plaintiffs,**

24 vs.

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 26 DR. DENNIS GROSS SKINCARE,
 LLC.
 27 **Defendant.**
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Case No. 2:20-cv-02311-MWF-GJS
 Case Filed: 2/10/2020
 FAC Filed: 8/26/2020
 SAC Filed: 12/16/2021

[CLASS ACTION]

JOINT CASE MANAGEMENT STATEMENT

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1 Plaintiffs Mocha Gunaratna and Renee Camenforte (“**Plaintiffs**”) and
2 Defendant Dr. Dennis Gross Skincare, LLC (“**Defendant**”), (collectively, the
3 “**Parties**”), submit this Joint Report regarding the parties’ proposed pretrial dates.

4 **A) Anticipated Discovery:**

5 **Plaintiffs’ position:** Defendant has indicated that it anticipates producing
6 supplemental document production, which Defendant expects to consist of thousands
7 of pages. Defendant also indicated that this production may include additional
8 documents from Defendant’s vendor, Active Concepts, LLC (“**Active Concepts**”).
9 Once the documents are produced, Plaintiffs anticipate needing to depose Defendant’s
10 corporate representative and Active Concepts’ corporate deponent. Plaintiffs also
11 anticipate conducting the expert prepared conjoint survey. Depending on the content
12 of the production, additional testing and/or attempts to obtain further evidence may
13 become necessary from Defendant and/or third parties.

14 Plaintiffs do not believe that more discovery is needed from the individual
15 Plaintiffs directly, given that the deadline to complete discovery as to individual
16 Plaintiffs’ claims was previously set by the Court.

17 Plaintiffs propose that the Parties submit initial expert disclosures, conducted
18 surveys, and reports drafted on the same day. Only true rebuttal expert reports (as
19 opposed to new survey evidence) should be produced thereafter. This will promote
20 efficiency, prevent last-minute comprehensive production, and avert any element of
21 surprise.

22 Plaintiffs also suggest that the parties submit a joint statement of undisputed facts
23 to avoid listing numerous disputed facts, followed by objections/responses. The
24 disputed facts can be submitted in a form of evidence for the Court’s consideration.

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1 **Defendant's position:** Defendant intends to send interrogatories and requests for
2 production to Plaintiffs. Defendant may also need to take depositions of the named
3 Plaintiffs based on discovery responses received and in light of the Court's rulings.

4 Defendant contends that it should be able to produce rebuttal surveys included
5 with its rebuttal reports so that Defendant and its experts can adequately address any
6 surveys or issues with whatever surveys Plaintiff conducts.

7 Defendant reserves the right to supplement discovery with any additional
8 information and documents as they become available.

9 **B) Proposed Timetable:**

Event	Joint Proposed Dates
Deadline for Parties to Confer Re: Dissemination of Class Notice	May 8, 2023
Defendant's First Production of Supplemental Discovery	May 12, 2023
Defendant's Second Production of Supplemental Discovery	June 5, 2023
Parties to Submit Their Joint Stipulation Regarding Dissemination of Class Notice	June 7, 2023
Non-Expert Discovery Cut-Off	September 11, 2023
Deadline to Identify Pre-Trial Experts, Provide Disclosures, Reports (if applicable), Surveys Conducted (Initial)	September 29, 2023
Deadline to Complete Depositions, and Document Production of The Experts Identified in the Initial Pretrial Disclosures	November 13, 2023
Deadline to Identify Rebuttal Experts, Provide Disclosures, Reports (if applicable)	December 15, 2023
Deadline to Complete Depositions, and Document Production of the Rebuttal Experts	February 23, 2024
Last Day to File <i>Daubert</i> Motions	March 15, 2024
Last Day to Confer Regarding Parties' Joint Submission of their Undisputed Facts	March 29, 2024

1	Last Day to file Summary Judgment Motions and a Joint Statement of Undisputed Facts	April 19, 2024
2	Last Day to File Oppositions to <i>Daubert</i> Motions	April 26, 2024
3	Last Day to File Reply to <i>Daubert</i> Motions	May 3, 2024
4	Last Day to File Oppositions to Summary Judgment Motions	May 17, 2024
5	Last Day to File Reply to Summary Judgment Motions	May 31, 2024
6	Last Day to Hear <i>Daubert</i> Motions	June 17, 2024
7	(Monday at 10:00 a.m.)	
8	Last Day to Hear Motions for Summary Judgment	July 1, 2024
9	(Monday at 10:00 a.m.)	
10	Deadline to File Memorandum of Contentions of Facts and Law Per L.R. 16.4	July 12, 2024
11	Last Day to Meet and Confer re: Joint Exhibit Lists, Witness Lists, and Expert Witness Lists	July 31, 2024
12	Last Day to Complete ADR	August 16, 2024
13	Deadline to File Witness Lists	August 16, 2024
14	Deadline to File Expert Witness Lists	August 16, 2024
15	Deadline to File Status Report Regarding Settlement	August 16, 2024
16	Deadline to File Motions <i>in Limine</i>	September 20, 2024
17	Deadline to File Oppositions to Motions <i>in Limine</i>	October 4, 2024
18	Deadline to Lodge Pre-Trial Conference Order Per L.R. 16.7	October 18, 2024
19	Final Pre-Trial Conference	October 25, 2024, at 11:00. a.m.
20	Jury Trial	November 4, 2024, at 8:30 a.m.
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1 DATED: April 14, 2023

CLARKSON LAW FIRM, P.C.

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/s/ Yana Hart

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Ryan J. Clarkson, Esq.

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Yana Hart, Esq.

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Tiara Avanness, Esq.

Valter Malkhasyan, Esq.

6 DATED: April 14, 2023

PRICE PARKINSON & KERR, PLLC

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/s/ Steven Garff

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Steven Garff, Esq.

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Jason Kerr, Esq.

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ATTESTATION OF FILER

Pursuant to Local Rule 5-4.3.4, the undersigned filer hereby attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing’s content and have authorized the filing.

Dated: April 14, 2023

CLARKSON LAW FIRM, P.C.

By: /s/ Yana Hart
Yana Hart, Esq.
Attorney for Plaintiffs

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