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18 *Counsel for Plaintiffs*

14 **UNITED STATES DISTRICT COURT**
15 **EASTERN DISTRICT OF CALIFORNIA**

17 BRIAN HEINZ, ERIC SWEETEN, MARIE
18 EDWARDS, LULA LEWIS, SHARON
19 MUANGPRASERT, and TYREE
20 CALDWELL, individually and on behalf of
21 similarly-situated persons,

22 Plaintiffs,

23 v.

24 THE LIFETIME VALUE CO. LLC,

25 Defendant.

Case No.: 2:25-cv-00949-JAM-SCR

Hon. Senior District Judge John A. Mendez

**STIPULATION AND ORDER GRANTING
PLAINTIFFS LEAVE TO FILE A ONE-
PAGE SUR-REPLY**

Action Filed:	March 26, 2025
Current Response Date:	None
Motion Date:	January 27, 2026 1:00 p.m.

Pursuant to an agreement between the Parties, Plaintiffs Brian Heinz, Eric Sweeten, Marie Edwards, Lula Lewis, Sharon Muangprasert, and Tyree Caldwell (collectively, “Plaintiffs”) and Defendant The Lifetime Value Co. LLC (“Defendant”) hereby enter into this Joint Stipulation and request for an Order by the Court (the “Stipulation”). In support of this Stipulation, the Parties state as follows:

WHEREAS, Plaintiffs filed the Complaint in this action on March 26, 2025 (ECF No. 1);

WHEREAS, Defendant filed (after extension of time granted by this Court) its Motion to Dismiss on September 15, 2025 (ECF No. 16);

WHEREAS, Plaintiffs’ filed a First Amended Complaint on September 29, 2025 and vacated the November 18, 2025 hearing date (ECF No. 20);

WHEREAS, the Court denied Defendant’s motion as moot and vacated the November 18, 2025 hearing date (ECF No. 21);

WHEREAS, Defendant filed its Motion to Dismiss First Amended Complaint on October 14, 2025, setting it for hearing on December 9, 2025 (ECF No. 26);

WHEREAS, Plaintiffs filed their Response on November 14, 2025. (Doc. 34);

WHEREAS, Defendant filed its Amended Reply on December 16, 2025 (Doc. 38);

WHEREAS, Defendant, in its Amended Reply, cited for the first time a case captioned *Trama v. RELX, Inc.*, No. 2:24-cv-03174 DSF-E (C.D. Cal. Apr. 4, 2025) (“*Trama*”);

WHEREAS, Defendant does not oppose Plaintiffs filing a one-page sur-reply to address the *Trama* decision; and

NOW, THEREFORE, BY AND THROUGH THEIR COUNSEL OF RECORD AND SUBJECT TO THE APPROVAL OF THIS COURT, THE PARTIES HEREBY STIPULATE AND AGREE THAT:

Plaintiffs’ have leave to file their one-page sur-reply addressing the decision in *Trama* and in opposition to Defendant’s Motion to Dismiss Plaintiffs’ First Amended Complaint.

1 Dated: December 30, 2025

ANDERSON + WANCA

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3 By: /s/ Patrick J. Solberg

Patrick J. Solberg (*admitted Pro Hac Vice*)

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5 S. Chandler Visher - S.B.N 52957

6 *Attorneys for Plaintiffs*

7 BRIAN HEINZ, ERIC SWEETEN, MARIE
8 EDWARDS, LULA LEWIS, SHARON
MUANGPRASERT, and TYREE
CALDWELL

9 Dated: December 30, 2025

10 By: /s/ Amber M. Trincado

(As authorized on December 30, 2025)

11 Vassi Iliadis

12 Amber M. Trincado

13 Jon M. Talotta

14 *Attorneys for Defendant*

15 THE LIFETIME VALUE CO. LLC

ORDER

The Court has read and considered the parties' Stipulation to allow the filing of a sur-reply by Plaintiffs in opposition to Defendant's Motion to Dismiss the First Amended Complaint. Based on the Stipulation, **IT IS ORDERED** that Plaintiffs are **GRANTED** leave to file a one-page sur-reply **on or before January 06, 2026**.

IT IS SO ORDERED.

Dated: December 30, 2025


JOHN A. MENDEZ,
SENIOR UNITED STATES DISTRICT JUDGE