

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANNE DE LACOUR, ANDREA WRIGHT,
and LOREE MORAN individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

COLGATE-PALMOLIVE CO., and
TOM'S OF MAINE INC.,

Defendants.

16 Civ. 8364 (RA)(AJP)

NOTICE OF MOTION TO STAY

PLEASE TAKE NOTICE that upon the annexed Declaration of Kathleen P. Lally, dated June 2, 2017, and the accompanying Memorandum of Law, the undersigned hereby moves this Court on behalf of Defendants Colgate-Palmolive Co. and Tom's of Maine, Inc. before the Honorable Ronnie Abrams, in Courtroom 1506 of the United States District Court for the Southern District of New York, Thurgood Marshall Courthouse, 40 Foley Square, New York, New York, 10007, for an order staying the above-captioned action in its entirety on the grounds of primary jurisdiction.

Dated: June 2, 2017

Respectfully submitted,

LATHAM & WATKINS LLP

/s/ Kathleen P. Lally

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Kathleen P. Lally (*pro hac vice*)

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