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9 Attorneys for Defendant Ryse Up Sports Nutrition LLC

10
11 **UNITED STATES DISTRICT COURT**
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

13 DANIEL RUCHMAN, on behalf of
14 himself and all others similarly
15 situated,

16 Plaintiff,

17 v.

18 RYSE UP SPORTS NUTRITION,
19 LLC,

20 Defendant.
21
22

Case No.: 2:26-cv-05434-CV-PD

**STIPULATION TO SET ASIDE
REQUEST FOR ENTRY OF
DEFAULT OR DEFAULT AND TO
EXTEND TIME FOR RESPONSE TO
COMPLAINT**

Hon. Cynthia Valenzuela

23
24 Plaintiff Daniel Ruchman and Defendant Ryse Up Sports Nutrition, LLC (“Ryse”)
25 (collectively with Plaintiff, the “Parties”), by and through their undersigned counsel of
26 record, hereby stipulate as follows:
27
28

1 **WHEREAS**, on May 21, 2026, Plaintiff filed the Complaint in this case;

2 **WHEREAS**, on July 27, 2026, Plaintiff filed a Motion for Clerk to Enter Default
3 (Dkt. 12);

4 **WHEREAS**, Defendant has recently retained undersigned counsel to respond to
5 the Complaint;

6 **WHEREAS**, Plaintiff stipulates and agrees that the Motion for Clerk to Enter
7 Default should be denied without prejudice (or, if it has been acted upon before the Court
8 considers this Stipulation, that any default be set aside) and that Ryse should be afforded
9 21 days to respond to the Complaint;

10 **IT IS HEREBY STIPULATED AND AGREED** by the Parties, subject to the
11 Court's approval, as follows:

- 12 1. That Plaintiff's Motion for Clerk to Enter Default (Dkt. 12) be denied
13 without prejudice or if a default has already been entered at the time the
14 Court acts on this stipulation, that the default be set aside; and
15 2. That Defendant shall have until August 27, 2026, to file its response to the
16 Complaint.

17
18 Dated: August 6, 2026

AMIN WASSERMAN GURNANI, LLP

19
20 /s/ William P. Cole

21 William P. Cole

22 *Attorneys for Defendant*

23
24 Dated: August 6, 2026

CHARLES C. WELLER, APC

25
26 /s/ Charles C. Weller

27 Charles C. Weller

28 *Attorneys for Plaintiff*

Civil L.R. 5-4.3.4 Certification

The undersigned certifies that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

/s/ William P. Cole

CERTIFICATE OF SERVICE
(United States District Court)

I hereby certify that on the 6th day of August, 2026, I caused the electronic filing of the foregoing document, through the CM/ECF system. The aforementioned document will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as nonregistered participants.

/s/ William P. Cole

William P. Cole