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

DANIEL RUCHMAN, *individually*
and on behalf of all those similarly
situated,

Plaintiff,

v.

RYSE UP SPORTS NUTRITION
 LLC,
a Texas limited liability company,

Defendant.

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

**STIPULATION AND ORDER
 FOR LEAVE TO FILE FIRST
 AMENDED COMPLAINT**

Hon. Cynthia Valenzuela

Complaint Filed: May 21, 2026

WHEREAS on May 21, 2026, Plaintiff DANIEL RUCHMAN (“Plaintiff”) filed his Class Action Complaint in this action against RYSE UP SPORTS NUTRITION LLC (“Defendant”);

1 WHEREAS Plaintiff seeks to file his First Amended Class Action
2 Complaint (“FAC”), which adds allegations relating to additional testing and
3 corrects certain clerical errors in the original Complaint;
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5 WHEREAS a copy of Plaintiff’s proposed FAC is attached hereto as Exhibit
6 A, and a copy of the same FAC redlined to show changes from the original
7 Complaint is attached hereto as Exhibit B;

8 IT IS HEREBY STIPULATED, by and between Plaintiff and Defendant,
9 by and through their respective counsel, that:

- 10 1. Plaintiff should be granted leave to amend to file his First Amended Class
11 Action Complaint for Damages, a copy of which is attached hereto as
12 Exhibit A.
13 2. Defendant’s responsive pleading shall be due twenty-one (21) days after
14 the First Amended Complaint is filed.

15 Respectfully submitted,

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17 /s/ Charles C. Weller
Charles C. Weller
Attorney for Plaintiff

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19 /s/ Matthew Orr
William P. Cole
Attorney for Defendant

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21 August 20, 2026
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CERTIFICATE OF SERVICE

I hereby certify that on this date, August 20, 2026, I caused the foregoing to be filed into the docket of this matter via the Clerk of Court's CM/ECF system, which filing caused service to be made on all counsel of record.

Respectfully submitted,

/s/ Charles C. Weller

Charles C. Weller (SBN: 207034)

Attorney for Plaintiff