

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: SOCLEAN, INC., MARKETING,  
SALES PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

This document relates to: *SoClean, Inc. v.  
Koninklijke Philips N.V., et al.*, 2:22-cv-542

Master Docket: No. 22-mc-152  
MDL No. 3021

KONINKLIJKE PHILIPS N.V.,  
PHILIPS NORTH AMERICA LLC, and  
PHILIPS RS NORTH AMERICA LLC,

Counterclaim-  
Plaintiffs,

v.

SOCLEAN, INC. and DW MANAGEMENT  
SERVICES, LLC,

Counterclaim-  
Defendants.

**STIPULATION AND ORDER**

This stipulation is entered into by and among SoClean, Inc., DW Management Services, LLC, Philips RS North America LLC, Koninklijke Philips N.V., and Philips North America LLC (collectively, the “Parties”). The Parties stipulate as follows:

1. Subject to Paragraph 2 below, the Parties have agreed to stay all discovery and to continue all existing deadlines in the business-to-business case, including the evidentiary hearing currently scheduled for September 12, 2024, subject to any Party’s ability to lift the stay in that Party’s discretion following three business days’ written notice to the other Parties. In the event the stay is lifted, the schedule going forward will be commensurate with the schedule that had been in place on June 6, 2024 (following the telephonic conference with the Court that day). For

example, if a deadline would have been two weeks from June 6, the new deadline would be two weeks from the date the stay is lifted.

2. The Parties agree to move forward with the Rule 706 FDA expert hearing scheduled for June 18, 2024.

3. The Parties will submit a joint status report to the Court by July 31, 2024.

Dated: June 10, 2024

Respectfully submitted,

/s/ Colin Cabral

Colin G. Cabral (BBO # 670234)  
ccabral@proskauer.com  
Michael R. Hackett (BBO # 676693)  
mhackett@proskauer.com  
James R. Anderson (BBO # 693781)  
jaanderson@proskauer.com  
Proskauer Rose LLP  
One International Place  
Boston, MA 02110  
Tel: (617) 526-9600  
Fax: (617) 526-9899

*Counsel for SoClean, Inc. and DW Management  
Services, LLC*

/s/ Michael H. Steinberg

Michael H. Steinberg  
steinbergm@sullcrom.com  
SULLIVAN & CROMWELL LLP  
1888 Century Park East  
Los Angeles, CA 90067  
Tel: (310) 712-6670

/s/ William B. Monahan

Tracy Richelle High  
hight@sullcrom.com  
William B. Monahan  
monahanw@sullcrom.com  
Alexandra Bodo  
bodoa@sullcrom.com  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, NY 10004-2498  
Tel: (212) 558-4000

*Counsel for Koninklijke Philips N.V. and Philips  
North America LLC*

/s/ Erik T. Koons

Erik T. Koons (D.C. Bar No. 468289)  
erik.koons@bakerbotts.com  
BAKER BOTTS LLP  
700 K Street, N.W.  
Washington, D.C. 20001  
Tel: (202) 639-7973  
Fax: (202) 585-1086

/s/ Andrew George

Andrew George (PA Bar No. 208618)  
andrew.george@bakerbotts.com  
BOURELLY, GEORGE & BRODY LLP  
1050 30<sup>th</sup> Street, N.W.  
Washington, D.C. 20007  
Tel: (202) 753-5012

*Counsel for Philips RS North America LLC*

**SO ORDERED:**

Dated: June 10, 2024

s/Joy Flowers Conti

Hon. Joy Flowers Conti  
Senior U.S. District Court Judge