

completion of the individual AAA proceedings (the “Motion”). This Motion is supported by an accompanying brief in support.¹

Respectfully submitted,

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By: /s/ Harrison Brown

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¹ Plaintiffs voluntarily dismissed several individual defendants following the filing of their Second Amended Complaint (Dkt. 53; “SAC”). (Dkt. 65.) Plaintiffs also submitted a motion for leave to file a Third Amended Complaint (“TAC”), which omits allegations against the dismissed defendants, but is otherwise identical to the SAC. (Dkt. 64.) The Court has not granted the motion for leave as of the date of this filing. However, since the parties agreed that the deadlines to respond to the SAC and TAC shall remain the same, Defendants provide parallel citations to both the SAC and TAC in support of their Motion.

CERTIFICATE OF CONFERENCE

Pursuant to Northern District Local Rule 7.1(a), I hereby certify that I have conferred with Blake Lindemann, counsel for Plaintiffs Helen Jia (aka Jingmin Rogers), and Sarah Sormillon and Jeffrey Jacobson, counsel for Defendant Michael Shouhed, concerning the substance of this Motion. Plaintiffs are opposed to the relief sought herein. Shouhed is unopposed to the relief sought herein.

By: /s/ Harrison Brown

Harrison Brown

CERTIFICATE OF SERVICE

On December 19, 2017, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or *pro se* parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

HELEN JIA (AKA JINGMIN ROGERS), an)	
individual, SARAH SORMILLON, an individual,)	Case No. 3:17-cv-03057-C
and all those similarly situated,)	
)	Judge Sam R. Cummings
Plaintiffs,)	
)	
vs.)	
)	
NERIUM INTERNATIONAL, LLC, a Texas limited)	
liability company, NERIUM SKIN CARE, INC., a)	
Texas corporation, NERIUM BIOTECHNOLOGY,)	
INC., a Texas corporation, NATURAL)	
TECHNOLOGY, D/B/A NATURTECH, a Texas)	
corporation, JEFF OLSON, an individual, RENEE)	
OLSON, an individual, AMBER OLSON ROURKE,)	
an individual, MICHAEL SHOUHED, an individual,)	
and DOES 1-10,)	
)	
Defendants.)	

**[PROPOSED] ORDER GRANTING MOTION TO COMPEL ARBITRATION AND TO
DISMISS OR STAY ACTION, FILED BY DEFENDANTS NERIUM INTERNATIONAL,
LLC, JEFF OLSON, RENEE OLSON, AND AMBER OLSON ROURKE**

The Court, having considered the Motion to Compel Arbitration, or to Dismiss or Stay Action, filed by Defendants Nerium International, LLC (“Nerium”), Jeff Olson, Renee Olson, and Amber Olson Rourke (the “Olsons”), the response, if any, and arguments of counsel, if any, is of the opinion that the Motion should be, in all things, GRANTED.

It is therefore ORDERED that:

1. Plaintiffs Helen Jia (aka Jingmin Rogers) and Sarah Sormillon (collectively, “Plaintiffs”) are directed to arbitrate their claims on an individual basis in the

proceedings already underway before the American Arbitration Association (“AAA”); and

2. This action is:

_____ Dismissed, without prejudice; or

_____ Stayed pending conclusion of each of the pending AAA proceedings.

SO ORDERED.

DATED: _____

By: _____
Hon. Sam R. Cummings
United States District Judge

CERTIFICATE OF SERVICE

On December 19, 2017, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or *pro se* parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

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