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ELECTRONICALLY  
**FILED**  
Superior Court of California,  
County of San Francisco  
**06/06/2025**  
Clerk of the Court  
BY: WILMA CORRALES  
Deputy Clerk

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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF SAN FRANCISCO  
10

11 LAUREN DANN, individually and on behalf  
of themselves and all others similarly situated,

12 Plaintiff,

13 vs.  
14

15 THE RODAN + FIELDS COMPANY,  
RODAN + FIELDS LLC, DR. KATIE  
16 RODAN, DR. KATHY FIELDS, DIMITRI  
HALOULOS, TIM ENG, LAURA BEITLER,  
DALIA STODDARD, JESSICA RAEFIELD,  
17 JANINE WEBER and DOES 1-100,

18 Defendants.  
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Case No. CGC24612800  
Assigned to Honorable Jeffrey S. Ross  
Department 606

**CLASS ACTION**

**DEFENDANTS' MEMORANDUM OF  
POINTS AND AUTHORITIES IN  
SUPPORT OF MOTION TO FILE UNDER  
SEAL SUPPLEMENTAL DECLARATION  
OF THOMAS TRAUTMANN IN  
SUPPORT OF MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT**

*[Filed Concurrently with Notice of Motion;  
Declaration of Christopher T. Berg; Notice of  
Lodging; [Proposed] Order; and Proof of  
Service]*

Date: June 20, 2025  
Time: 9:00 a.m.  
Dept.: 606

**Hrg. reserved by Courtroom  
(see attachment)**

Trial Date: None Set

Action Filed: March 1, 2024

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 Defendants The Rodan + Fields Company LLC (“R+F”), Rodan + Fields LLC, Dr. Katie  
4 Rodan, Dr. Kathy Fields, Dimitri Haloulos, Tim Eng, Laura Beitler, Dalia Stoddard, Jessica  
5 Raefield, and Janine Weber (collectively, “Defendants”) seek to file under seal the Supplemental  
6 Declaration of Thomas Trautmann (“Declaration”) submitted in support of Plaintiff Lauren  
7 Dann’s Motion for Preliminary Approval of Class Action Settlement.<sup>1</sup>

8 The Declaration should be filed under seal because it contains confidential financial  
9 information relating to R+F’s financial condition, financial obligations, confidential business  
10 plans, financial projections, funding, and other similar confidential business information. This  
11 information is non-public and it would substantially harm R+F’s interests if the information was  
12 publicly disclosed. California courts have repeatedly recognized that such confidential financial  
13 information may be filed under seal, none of which bears on the merits of Plaintiff’s claims here.  
14 The Court should therefore grant Defendants leave to file the Declaration under seal.

15 **II. ARGUMENT**

16 The public’s right “to inspect and copy judicial records is not absolute.” (*Nixon v. Warner*  
17 *Comms., Inc.* (1978) 435 U.S. 589, 598.) California Rules of Court, rule 2.550 empowers courts  
18 to order that a record be filed under seal if it finds that (1) there exists an overriding interest that  
19 supports sealing the record and overcomes the right of public access to the record, (2) there is a  
20 substantial probability that the overriding interest will be prejudiced if the record is not sealed, (3)  
21 the proposed sealing is narrowly tailored, and (4) there is no less restrictive means to satisfy the  
22 overriding interest. (Cal. Rules of Court, rule 2.550, subd. (d)(1)-(4).)

23 Courts frequently recognize that documents containing confidential financial information  
24 may be appropriately filed under sealed. (See, e.g., *Universal City Studios, Inc. v. Superior Court*  
25 (2003) 110 Cal.App.4th 1273, 1282, 1285-1286 [holding that “financial information [that]  
26 involves confidential matters relating to the business operations of defendant” are ordinarily  
27

28 <sup>1</sup> Defendants do not seek to file under seal Exhibits A and B to the Declaration.

1 subject to sealing]; *Cassidy v. California Bd. of Acct.* (2013) 220 Cal.App.4th 620, 625 [ordering  
2 company financial information sealed]; see also *Overstock.com, Inc. v. Goldman Sachs Group,*  
3 *Inc.* (2014) 231 Cal.App.4th 471, 505 [confidential financial information]; *McGuan v.*  
4 *Endovascular Tech., Inc.* (2010) 182 Cal.App.4th 974, 987-989 [“business methods and  
5 processes”].) Moreover, the right to privacy under Article I, Section 1 of the California  
6 Constitution “extends to one’s confidential financial affairs . . . .” (*Overstock.com, supra*, 231  
7 Cal.App.4th at p. 503, citing *Valley Bank of Nevada v. Superior Court* (1975) 15 Cal.3d 652, 656;  
8 see also *H & M Assocs. v. City of El Centro* (1980) 109 Cal.App.3d 399, 410 [extending privacy  
9 rights to business entities].) This right embraces confidential financial information in “whatever  
10 form it takes, whether that form be tax returns, checks, statements, or other account information.”  
11 (*Overstock.com, supra*, 231 Cal.App.4th at p. 503.)

12         Here, the Declaration reflects sensitive, non-public financial information regarding its  
13 current assets, liabilities, financial structuring, financial projections, cashflow, creditors, debtors,  
14 financial obligations, and funding. (Trautmann Decl. ¶¶ 6-9.) This information is kept strictly  
15 confidential (see Trautmann Decl. ¶ 2), and public disclosure of this information could  
16 substantially prejudice R+F, as it would reveal confidential financial arrangements and business  
17 plans. Thus, R+F’s overriding interest in its confidential business information would be  
18 prejudiced by disclosure of the information in the Declaration. And where revealing “confidential  
19 matters relating to the business operations” of party “would interfere with [the party’s] ability to  
20 effectively compete in the marketplace,” courts have found sealing appropriate. (*Universal City,*  
21 *supra*, 110 Cal.App.4th at p. 1286; see also *Cassidy, supra*, 220 Cal.App.4th at p. 625 [companies  
22 have a “right of privacy and confidentiality” that merits sealing “financial record[s]”].)

23         Conversely, R+F’s financial status does not bear on the merits of Plaintiff’s claim, thus  
24 substantially reducing the public’s interest in accessing that information. (Cf. *Overstock.com,*  
25 *supra*, 231 Cal.App.4th at p. 497 & fn.14 [recognizing lower standard for sealing “confidential  
26 financial information [that is] irrelevant to the Court’s resolution of the legal challenges”].)  
27 Finally, R+F’s request to seal is narrowly tailored. The Declaration has limited financial  
28 information included for the Court’s consideration and there is no alternative method of providing

1 this information to the Court. No less restrictive means exist for protecting R+F's overriding  
2 interests in sealing the Declaration.

3 **III. CONCLUSION**

4 For the foregoing reasons, Defendants respectfully request that the Court grant its request  
5 to file under seal the Supplemental Declaration of Thomass Trautmann.

6  
7 DATED: June 6, 2025

ELLIS GEORGE LLP

Eric M. George  
Christopher T. Berg

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10 By: /s/ Christopher T. Berg

11 CHRISTOPHER T. BERG  
12 Attorneys for Defendants  
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**From:** Department606\_Complex <Department606\_complex@sftc.org>  
**Sent:** Friday, June 6, 2025 3:13 PM  
**To:** David J. Carroll; Department606\_Complex  
**Cc:** ksimplicio@tzlegal.com; skhader@tzlegal.com; ecooper@tzlegal.com; gdanas@clarksonlawfirm.com; cle@clarksonlawfirm.com; yhart@clarksonlawfirm.com; kleeviraphan@clarksonlawfirm.com; jmedwid@clarksonlawfirm.com; ksimplicio@clarksonlawfirm.com; Christopher T. Berg; Diane Torosyan  
**Subject:** RE: Request for Hearing Date / Lauren Dann v. The Rodan + Fields Company, et al., Case No. CGC24612800

Counsel:


Defense counsel may notice their intended motion to seal for 6/20/25 at 9:00 a.m.

In the future, parties should request a reservation for a hearing early enough to file their intended motion on regular notice.

Thank you.

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**From:** David J. Carroll <dcarroll@ellisgeorge.com>  
**Sent:** Friday, June 6, 2025 12:57 PM  
**To:** Department606\_Complex <Department606\_complex@sftc.org>  
**Cc:** ksimplicio@tzlegal.com; skhader@tzlegal.com; ecooper@tzlegal.com; gdanas@clarksonlawfirm.com; cle@clarksonlawfirm.com; yhart@clarksonlawfirm.com; kleeviraphan@clarksonlawfirm.com; jmedwid@clarksonlawfirm.com; ksimplicio@clarksonlawfirm.com; Christopher T. Berg <cberg@ellisgeorge.com>; Diane Torosyan <dtorosyan@ellisgeorge.com>  
**Subject:** Request for Hearing Date / Lauren Dann v. The Rodan + Fields Company, et al., Case No. CGC24612800

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Dear Clerk of the Court,

With respect to the above-referenced matter, Defendants The Rodan + Fields Company LLC, et al. (“Rodan”) are seeking to file under seal the Supplemental Declaration of Thomas Trautman, to be submitted today in support of Plaintiff Lauren Dann’s Motion for Preliminary Approval of Class Action Settlement. Rodan intends to file the Motion to File Under Seal today and would like to reserve a hearing date for that motion. If the Court’s calendar permits, Rodan would request the Court to advance the Motion to file Under Seal hearing to the same day as the hearing for the Preliminary Hearing Motion, which is set for June 20, 2025. This will permit the Court to consider the entire sealed Supplemental Declaration of Thomas Trautman in connection with the Preliminary Hearing Motion, and Plaintiff has confirmed that she will not oppose the Motion to Seal.

Please let us know if we may have the Motion to File Under Seal heard on June 20, 2025, or if Defendants should insert a different hearing date.

Thank you.

**David J. Carroll** | Partner

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