

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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**WOODMAN'S FOOD MARKET, INC.**

2631 Liberty Lane  
Janesville, Wisconsin 53545,

Plaintiff,

v.

Case No. 14-CV-734

**THE CLOROX COMPANY**

a Delaware corporation  
1221 Broadway  
Oakland, California 94612,

**THE CLOROX SALES COMPANY**

a Delaware corporation  
1221 Broadway  
Oakland, California 94612,

And

**UN-NAMED CO-CONSPIRATORS**

Defendants.

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**PLAINTIFF'S MOTION FOR LEAVE TO AMEND COMPLAINT**

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Plaintiff, Woodman's Food Market, Inc., respectfully moves the Court for leave to file an Amended Complaint in this matter. A true and correct copy of the Plaintiff's Proposed Amended Complaint is being filed with this Motion. This motion is made pursuant to Federal Rule of Civil Procedure 15(a)(2).

Plaintiff has requested that opposing counsel consent to such amendment, but opposing counsel has failed to agree to that request. The basis for this motion is set forth in the Plaintiff's Brief in Opposition to Defendants' 2<sup>nd</sup> Motion to Dismiss and in Support of Plaintiff's Motion

for Leave to Amend Complaint, and is supported by the Affidavit of Andy Anundson in Support of Plaintiff's Opposition to Clorox's Motion to Dismiss and Plaintiff's Motion to Amend Complaint, which are also being filed with this Motion.

Respectfully submitted this 20<sup>th</sup> day of March, 2015.

**VON BRIESEN & ROPER, S.C.**  
Attorneys for Plaintiff,  
Woodman's Food Market, Inc.

By: /s/ John A. Kassner

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