1 2 3 4 5 6 7 8 9	David R. Markham (SBN 071814) dmarkham@markham-law.com <b>THE MARKHAM LAW FIRM</b> 750 B Street, Suite 1950 San Diego, California 92101 Tel.: (619) 399-3995 Fax: (619) 615-2067 [Additional counsel list on next page] Attorneys for Plaintiffs <b>UNITED STATES I</b> <b>EASTERN DISTRIC</b>	
<ol> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	LUIS NOVOA, individually, and on behalf of other members of the general public similarly situated, Plaintiff, vs. CHARTER COMMUNICATIONS, LLC, a Delaware limited liability company; and DOES 1 through 100, inclusive, Defendant.	

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	Attorney for Defendant
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## **STIPULATION**

WHEREAS, on July 5, 2013, Plaintiff Luis Novoa ("Plaintiff") filed his Complaint in the Superior Court of California for the County of Stanislaus against Defendant Charter Communications, LLC ("Defendant");

WHEREAS, on August 16, 2013, Defendant removed this action to this Court;

**WHEREAS**, the currently operative complaint in this action is First Amended Complaint, filed on October 31, 2013;

WHEREAS, Plaintiff seeks to file his Second Amended Complaint which adds Michael Alvarez, Brian Belote-Dinford and Trevor Grant as additional class representatives. A copy of the proposed Second Amended Complaint is attached hereto as **Exhibit A**;

**IT IS HEREBY STIPULATED**, by and between Plaintiff and Defendant, by and through their respective counsel of record, that:

1. Plaintiff may file his Second Amended Complaint (attached as Exhibit A);

2. Defendant's response to Plaintiff's Second Amended Complaint shall be filed within thirty (30) days after the Second Amended Complaint is filed.

## IT IS SO STIPULATED.

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3	Dated: June 2, 2015 Respectfully submitted:	
4	THE MARKHAM LAW FIRM	
5		
6	/s/ David R. Markham	
7	Attorney for Plaintiff E-mail: dmarkham@markham-law.com	
8		
9		
10	Dated: June 2, 2015 Respectfully submitted:	
11		
12	SHEPPARD MULLIN RICHTER & HAMPTON, LLP	
13	HAWII ION, LLI	
14	/s/ Thomas R. Kaufman	
15 16	Attorney for Defendant E-mail: tkaufman@sheppardmullin.com	
16 17		
17	I, David R. Markham, attest that I have obtained concurrence from defense	
10	counsel regarding the filing of this Stipulation.	
20	THE MARKHAM LAW FIRM	
21		
22	/s/ David R. Markham	
23	Attorney for Plaintiff E-mail: dmarkham@markham-law.com	
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1	ODDED	
1 2	ORDER	
2	Good cause having been shown, based upon the parties' signed Stipulation	
4	filed on June 2, 2015, and based on the records in the above-captioned action, the	
5	Court hereby orders as follows:	
6	1. Plaintiff may file his Second Amended Complaint no later than June 8,	
7	2015;	
8	2. Defendant's response to Second Amended Complaint shall be due thirty	
9	(30) days after the Second Amended Complaint is filed.	
10	3. All dates previously set (Doc. 34) remain in effect.	
11	IT IS SO ORDERED.	
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13	Dated: June 3, 2015 /s/ Barbara A. McAuliffe UNITED STATES MAGISTRATE JUDGE	
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