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8 Attorneys for: Plaintiffs and Proposed Class Representatives BECKY GREER,  
9 TIMOTHY C. BUDNIK, HALEY MARKWITH, ROSARIO SAENZ and  
10 IAN CARTY

11 **UNITED STATES DISTRICT COURT**  
12 **EASTERN DISTRICT OF CALIFORNIA**

13 BECKY GREER; TIMOTHY C. BUDNIK;  
14 ROSARIO SAENZ; and IAN CARTY,  
15 Individually and as “Class Representatives,”

16 Plaintiffs,

17 v.

18 PACIFIC GAS AND ELECTRIC  
19 COMPANY, and DOES 1 through 10,  
20 inclusive,

21 Defendants.

Case No. 1:15-CV-01066-GSA

**CLASS ACTION**

**STIPULATION AND ORDER FOR  
FILING OF FIRST AMENDED  
COMPLAINT FOR DAMAGES,  
INJUNCTIVE, AND  
DECLARATORY RELIEF**

22 **WHEREAS** on July 10, 2015, Plaintiffs Becky Greer, Timothy C. Budnik,  
23 Haley Markwith, Rosario Saenz, and Ian Carty, Individually and as “Class Representatives”  
24 and on behalf of the Class (“Plaintiffs”), filed their complaint for Damages, Injunctive and  
25 Declaratory Relief in this action against Defendant Pacific Gas and Electric Company (“PG&E  
26 or “Defendant”);

27 **WHEREAS** Defendant’s deadline to file a responsive pleading is August 28,  
28 2015;

**WHEREAS** Plaintiffs seeks to file their First Amended Complaint for  
Damages, Injunctive and Declaratory Relief;

{7608/002/00568821.DOCX}

1           **WHEREAS** a copy of Plaintiff’s proposed First Amended Complaint for  
2 Damages, Injunctive and Declaratory Relief is attached hereto as Exhibit “A”;

3           **WHEREAS** the parties have met and conferred regarding the allegations  
4 contained in Plaintiffs’ proposed First Amended Complaint;

5           **IT IS HEREBY STIPULATED**, by and through Plaintiffs and Defendant,  
6 through their respective attorneys of record that:

7           1.       Plaintiffs should be granted leave to file a First Amended Complaint for  
8 Damages, Injunctive and Declaratory Relief, a true and correct copy of which is attached  
9 hereto as Exhibit A.

10          2.       Defendant’s responsive pleading shall be due thirty (30) days after the  
11 First Amended Complaint for Damages, Injunctive and Declaratory Relief is filed.

12  
13 DATED: AUGUST 26, 2015

WANGER JONES HELSLEY PC

14  
15 By: /s/ Patrick D. Toole  
16 Patrick D. Toole,  
17 Dylan J. Crosby  
18 Attorneys for Plaintiffs

19  
20 DATED: AUGUST 26, 2015

LITTLER MENDELSON, P.C.

21  
22 By: /s/ Robert G. Hulteng  
23 Robert G. Hulteng,  
24 Joshua D. Kienitz,  
25 Matthew R. Dardenne,  
26 Aurelio J. Perez,  
27 Attorneys for Defendant

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**ORDER**

The Court having reviewed the foregoing Stipulation and good cause appearing therefore:

**IT IS HEREBY ORDERED** that Plaintiffs are granted leave to file their First Amended complaint, a copy of which is attached hereto as Exhibit "A."

**IT IS ALSO HEREBY ORDERED** that Defendant's responsive pleadings shall be due thirty (30) days after the First Amended Complaint is filed.

**IT IS ALSO HEREBY ORDERED** that the Clerk of the Court shall file in the First Amended Complaint (Exhibit A) as a separate docket entry. The First Amended Complaint will be as deemed filed as of the date it is docketed.

IT IS SO ORDERED.

Dated: August 27, 2015

/s/ Gary S. Austin  
UNITED STATES MAGISTRATE JUDGE