1 Rory C. Quintana (SBN 258747) Hallie B. Albert (SBN 258737) **OUINTANA ALBERT LLP** 201 Spear Street, Suite 1100 3 San Francisco, CA 94105 Telephone: (415) 504-3121 Fax: (415) 233-8770 4 rory@qalegal.com 5 Attorney for Plaintiff 6 UNITED STATES DISTRICT COURT 7 EASTERN DISTRICT OF CALIFORNIA 8 9 ANTHONY SPRADLIN, an individual, CASE NO.: 2:13-cv-02260-TLN-AC 10 Plaintiff. STIPULATION FOR LEAVE OF COURT TO FILE FIRST AMENDED COMPLAINT AND 11 ORDER v. 12 **KASCO CORPORATION** a Delaware corporation; and **DOES 1 through 10**, 13 inclusive. 14 Defendants.. 15 16 **STIPULATION** 17 This Stipulation is made and entered into between Plaintiff Anthony Spradlin (herein 18 "Plaintiff") and Defendant Kasco Corporation (herein "Defendant"), by and through their 19 respective counsel, with reference to the following. 20 1. WHEREAS, on October 31, 2013, Plaintiff filed his initial Complaint in the 21 above-referenced matter with this Court; 2. 22 WHEREAS, Defendant has requested and been provided two extensions for filing a responsive pleading; 23 3. WHEREAS, Plaintiff's co-worker Gary Allen wishes to pursue litigation against 24 Defendant; 25 4. WHEREAS, Gary Allen's issues, claims and causes of action against Defendant 26 are alleged to be identical to those plead by Plaintiff; 27 5. WHEREAS, it is in the interest of judicial economy to litigate Plaintiff and 28 Case No. 2:13-cv-02260-TLN-AC STIPULATION FOR LEAVE OF COURT TO FILE FIRST AMENDED COMPLAINT AND

**ORDER** 

1	Allen's claims together;	
2	THEREFORE, IT IS HEREBY STIPULATED by and between the parties hereto,	
3	through their respective attorneys of record the	at Plaintiff may file a First Amended Complaint, a
4	copy of which is attached hereto.	
5	IT IS FURTHER STIPULATED that I	Defendant waives notice and service of the First
6	Amended Complaint and shall have twenty-or	ne (21) days from the filing the First Amended
7	Complaint to file a responsive pleading.	
8	Dated: December 26, 2013	QUINTANA ALBERT LLP
10		
11		By: s/Rory C. Quintana
12		Rory C. Quintana Attorney for Plaintiff
13		
14		
15	Dated: December 26, 2013	BEST BEST & KRIEGER LLP
16		
17		By:/s/ Laura Fowler Laura Fowler
18		Attorney for Defendant
19		
	Dated: December 26, 2013	ICE MILLER LLP
20 21		By:/s/ Paul Sinclair
22		Paul Sinclair Attorney for Defendant
23		Anomey for Defendant
24		
25		
26		
27		
28		
40	Case No. 2:13-cv-02260-TLN-AC	2 STIPULATION TO FILE FIRST AMENDED COMPLAINT

1	ORDER	
2	The Court having considered the stipulation of the parties, and good cause appearing	
3	therefore, orders as follows:	
4	1. Plaintiff Anthony Spradlin may file the proposed FIRST AMENDED	
5	COMPLAINT as stipulated above.	
6	IT IS SO ORDERED.	
7		
8	Dated: December 27, 2013	
9		
10	Van Van Lay	
11	Travel Maria	
12	Troy L. Nunley United States District Judge	
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
20		