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16 Attorneys for Plaintiff RICARDO CASTILLO

17 **UNITED STATES DISTRICT COURT**

18 **EASTERN DISTRICT OF CALIFORNIA**

19 RICARDO CASTILLO, individually and on
20 behalf of all others similarly situated,

21 Plaintiff,

22 v.

23 ADT LLC and DOES 1–100, inclusive,

24 Defendants.

Case No. 2:15-cv-00383-WBS-KJN

**JOINT STIPULATION TO FILE SECOND
AMENDED COMPLAINT; [PROPOSED]
ORDER**

1 WHEREAS Defendant ADT LLC (hereinafter, "Defendant") and Plaintiff Ricardo Castillo
2 (hereinafter, "Plaintiff") (collectively, the "Parties"), have entered into a Joint Stipulation and
3 Agreement of Compromise and Settlement of Class Action ("Class Settlement Agreement")
4 resolving the claims in this case;

5 WHEREAS, the parties have entered into a long form comprehensive Class Settlement
6 Agreement, including proposed notices to putative class members;

7 WHEREAS, Plaintiff is preparing the Motion for Preliminary Approval of Class Action
8 Settlement which will be filed this month;

9 WHEREAS, pursuant to the Class Settlement Agreement, the parties have agreed that
10 Plaintiff may file the Second Amended Complaint, which is attached hereto as Exhibit 1.

11 WHEREAS, the Parties now stipulate and agree that Plaintiff may file the Second Amended
12 Complaint, attached hereto as Exhibit 1.

13 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties.

14 DATED: August 15, 2016

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

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By: /s/ Linda Claxton (as authorized on 8/15/16)
Linda Claxton
Alec Hillbo

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Attorneys for Defendant
ADT LLC

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DATED: August 15, 2016

HARRIS & RUBLE
NORTH BAY LAW GROUP

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By: /s/ Alan Harris
Alan Harris
David S. Harris

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Attorneys for Plaintiff
RICARDO CASTILLO

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ORDER

IT IS SO ORDERED:

Dated: August 16, 2016



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE