1	Counsel listed on the following page.		
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9	UNITED STATES DISTRICT COURT		
10	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
11	SAN FRANCISCO DIVISION		
12			
13	PETER WRIGHT and MICHELLE TRAME, individually, on behalf of all	Case No. 3:12-cv-00982-EMC	
14	others similarly situated, and on behalf of the general public,	Assigned to Judge Edward M Chen	
15	Plaintiffs,	STIPULATION AND [PROPOSED]	
16	vs.	ORDER GRANTING STIPULATION TO PLAINTIFFS' FILING OF FIRST	
17	ADVENTURES ROLLING CROSS	AMENDED COMPLAINT	
18	COUNTRY, INC., dba ADVENTURES CROSS COUNTRY (ARCC), a California	Initial Complaint Filed: February 17, 2012	
19	Corporation, SCOTT VON ESCHEN, and DOES 1 through 50 inclusive,		
20	Defendants.		
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	STIPULATION & [PROPOSED] ORDER	Case No. CV 12-00982 EMC	

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1	<u>STIPULATION</u>	
2	Plaintiffs Peter Wright and Michelle Trame ("Plaintiffs") and Defendants Adventures Rolling	
3	Cross Country, Inc. ("ARCC") and Scott Von Eschen (collectively, "Defendants"), by and through	
4	the undersigned counsel, hereby stipulate as follows:	
5	WHEREAS, Plaintiffs' Initial Complaint was filed on February 17, 2012;	
6	WHEREAS, Plaintiffs have informed Defendants that Plaintiffs desire to file a First	
7	Amended Complaint ("FAC") adding a cause of action under the Private Attorneys General Act of	
8	2004, California Labor Code Section 2698, et seq.;	
9	WHEREAS, Plaintiffs and Defendants signed Memorandum of Understanding ("MOU") on	
10	August 2, 2013, agreeing to settle this case, and the Parties agreed in the MOU that Plaintiffs would	
11	file the instant Amended Complaint contemporaneously with the filing of an Unopposed Motion for	
12	Preliminary Approval of Class Action Settlement;	
13	WHEREAS, Plaintiffs have provided Defendants with a redline showing the manner in	
14	which the FAC differs from the original complaint (a copy of the redline is attached hereto as Ex.	
15	A);	
16	WHEREAS Federal Rule of Civil Procedure 15 states: "[A] party may amend its pleading	
17	only with the opposing party's written consent or the court's leave";	
18	WHEREAS Defendants consented in the MOU and hereby consent again in writing to the	
19	filing of the FAC;	
20	THEREFORE, it is hereby stipulated and agreed as follows:	
21	Defendants consent to Plaintiffs' filing of the FAC (attached hereto as Ex. B), and Plaintiffs	
22	shall proceed to file the FAC upon execution and filing of this stipulation.	
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1	Dated: August 16, 2013	BRYAN SCHWARTZ LAW
2		
3		/s/ Bryan Schwartz Bryan Schwartz, Bar No. 209903 Attorney for Plaintiffs
4		Attorney for Plaintiffs
5	Dated: August 16, 2013	HIRSCHFELD KRAEMER LLP
6		
7		/s/ Reed E. Schaper Reed E. Schaper, Bar No. 082792 Attorney for Defendants
8		Attorney for Defendants
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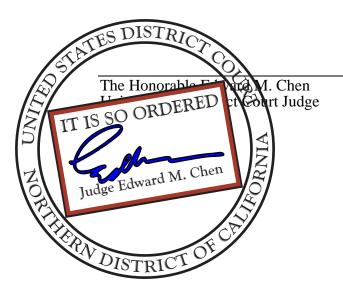
[PROPOSED] ORDER

The Court, having considered the stipulation agreed to by Plaintiffs Peter Wright and Michelle Trame ("Plaintiffs") and Defendants Adventures Rolling Cross Country, Inc. ("ARCC") and Scott von Eschen (collectively, "Defendants") to the filing of a First Amended Complaint, and finding good cause appearing therefore, HEREBY ORDERS AS FOLLOWS:

Plaintiffs are granted leave to file the First Amended Complaint.

IT IS SO ORDERED

Dated: _______2013



STIPULATION AND [PROPOSED] ORDER

Case No. CV 12-00982 EMC