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Attorneys for Defendants

**SYNARC, INC. and AARON TIMM**

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

**CAROLINA SUGIHARTO,**

Plaintiff,

vs.

**SYNARC, INC.; and AARON TIMM,**

Defendants.

Case No. C13-921-MMC

**JOINT STIPULATION BY THE PARTIES  
TO ALLOW PLAINTIFF TO FILE A FIRST  
AMENDED COMPLAINT; ~~PROPOSED~~  
ORDER; DIRECTIONS TO PLAINTIFF**

**FRCP 15(a)(2)**

1                   **STIPULATION RE: FIRST AMENDED COMPLAINT FOR DAMAGES**

2           This stipulation is entered into pursuant to Federal Rule of Civil Procedure 15(a)(2) and Local  
3 Rule 7-12 by and between Plaintiff CAROLINA SUGIHARTO ("Plaintiff") and Defendants SYNARC,  
4 INC. and AARON TIMM ("Defendants") (collectively, "The Parties") based upon the following facts:

5           1.       WHEREAS, Plaintiff seeks to add five claims for relief for 1) Interference under the  
6 Family Medical Leave Act; 2) Disability Discrimination under the Fair Employment and Housing Act  
7 ("FEHA"); 3) Failure to Reasonably Accommodate in Violation of the FEHA; 4) Failure to Engage in  
8 the Interactive Process in Violation of the FEHA; and 5) Retaliation in Violation of the FEHA, and  
9 Defendants agreed to stipulate to the filing of the proposed First Amended Complaint that is attached  
10 hereto as Exhibit A;

11          2.       WHEREAS, the Parties agreed that Defendants' stipulation would not serve to waive any  
12 defenses, objections, or right to discovery regarding the new causes of action, or the First Amended  
13 Complaint, and without admitting anything contained therein to be true.

14          3.       Based on the foregoing, the Parties, by and through their counsel of record and subject to  
15 this Court's approval, hereby stipulate and agree as follows:

- 16           a.       Plaintiff's First Amended Complaint attached hereto as Exhibit A shall be deemed  
17                   filed and served upon the date of the court's order;
- 18           b.       Defendants' counsel will accept service of the First Amended Complaint;
- 19           c.       Defendants reserve all rights, defenses, and objections to the claims set forth in  
20                   Plaintiff's First Amended Complaint, Exhibit A.
- 21           d.       Defendants will have twenty-one (21) days after their counsel is served with the  
22                   First Amended Complaint to file a responsive pleading.

23    //

24    //

1 IT IS SO STIPULATED.  
2

3 Dated: November 5, 2013  
4

SUNDEEN SALINAS & PYLE

5 By: /s/Tanya Tambling  
6 Hunter Pyle  
7 Tanya Tambling  
8 Attorney for Plaintiff  
9 CAROLINA SUGIHARTO

10 Dated: November 5, 2013

SEYFARTH SHAW, LLP

11 By: /s/Chantelle Egan  
12 Nick C. Geannacopulos  
13 Chantelle Egan  
14 Ari Hersher  
15 Attorneys for Defendants  
16 SYNARC, INC. and AARON TIMM

17 PURSUANT TO STIPULATION, IT IS SO ORDERED-, with the exception that Plaintiff  
18 shall file the operative complaint and shall do so no later than November 8, 2013.

19 Date: November 7, 2013

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21 DISTRICT COURT JUDGE MAXINE CHESNEY  
22  
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