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6 Attorneys for Defendants  
 7 AVIS RENT A CAR SYSTEM, LLC, AB CAR  
 8 RENTAL SERVICES, INC., BUDGET RENT A  
 CAR SYSTEM, INC.; AVIS BUDGET GROUP,  
 INC.; and MARIE PERAITA

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 10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA

12 GAURAV PATHAK, SALAH DAJANI,  
 13 ZANE HUSSEINI, NAVEED JALAL,  
 14 DOLAN LONERGAN, WILLIAM  
 MCRAE, MEUY XAIMUANGMONH  
 and LORD EL-SALAAM,

Case No. C 13-01823 JSW

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO AMEND ANSWER AND  
 NOTICE OF REMOVAL**

15 Plaintiffs,

16 v.

17 AVIS RENT A CAR SYSTEM, LLC, AB  
 18 CAR RENTAL SERVICES, INC.;  
 BUDGET RENT A CAR SYSTEM, INC.;  
 19 AVIS BUDGET GROUP, INC.; MARIE  
 PERAITA, an individual; and DOES 1 to  
 20 25, inclusive,

21 Defendants.

22 THIS STIPULATION is hereby entered into by and between Plaintiffs GAURAV  
 23 PATHAK, SALAH DAJANI, ZANE HUSSEINI, NAVEED JALAL, DOLAN LONERGAN,  
 24 WILLIAM MCRAE, MEUY XAIMUANGMONH, and LORD EL-SALAAM (collectively  
 25 “Plaintiffs”) and Defendants AVIS RENT A CAR SYSTEM, LLC; AB CAR RENTAL SERVICES,  
 26 INC.; BUDGET RENT A CAR SYSTEM, INC.; AVIS BUDGET GROUP, INC., and MARIE  
 27 PERAITA (collectively “Defendants”) by through their authorized counsel, with respect to the  
 28 following:

STIP. & ~~PROPOSED~~ ORDER TO AMEND  
 ANSWER AND NOTICE OF REMOVAL

Case No. C 13-01823 JSW

1 WHEREAS, Defendants filed an Answer to Plaintiffs' Unverified Complaint in the  
2 Superior Court of California, County of San Francisco, Case No. CGC-13-529903 on April 22, 2013  
3 which inadvertently omitted reference to Defendant AVIS BUDGET GROUP, INC.;

4 WHEREAS, Defendants filed a Notice of Removal (Doc. #1) on April 24, 2013,  
5 incorporating by reference Defendants' Answer, which inadvertently omitted reference to Defendant  
6 AVIS BUDGET GROUP, INC.;

7 WHEREAS, the parties have discussed and agreed to the items listed below.

8 NOW, THEREFORE, IT IS HEREBY STIPULATED that:

9 1. Defendant AVIS BUDGET GROUP, INC. will be deemed to have joined in  
10 Defendants' Answer previously filed in California Superior Court and incorporated by reference in  
11 the Notice of Removal;

12 2. Defendant AVIS BUDGET GROUP, INC. will be deemed to have joined in  
13 the Defendants' Notice of Removal;

14 3. The Notice of Removal and Answer will be amended to reflect that each  
15 document was filed on behalf of Defendant AVIS BUDGET GROUP, INC.;

16 4. The Clerk of Court shall amend the docket to reflect this amendment; and

17 5. Nothing in this stipulation shall constitute a waiver of Plaintiffs' challenge to  
18 removal on the basis of subject-matter jurisdiction, currently before this Court as Plaintiffs' Motion  
19 for Remand (Doc. #11).

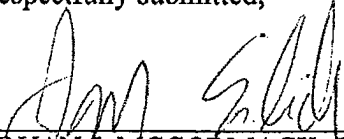
20 IT IS SO STIPULATED.

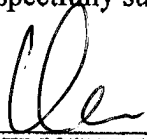
21 Dated: June 25, 2013

Dated: June 25, 2013

22 Respectfully submitted,

Respectfully submitted,

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24 \_\_\_\_\_  
25 BRYAN J. MCCORMACK, ESQ.  
26 JASON M. ERLICH, ESQ.  
27 MCCORMACK & ERLICH, LLP  
28 Attorneys for Plaintiffs

  
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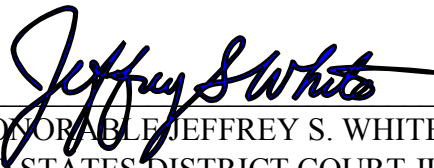
PATRICK H. HICKS  
KAI-CHING CHA  
LITTLER MENDELSON, P.C.  
Attorneys for Defendants

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**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 26, 2013.



HONORABLE JEFFREY S. WHITE  
UNITED STATES DISTRICT COURT JUDGE

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