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5 Attorneys for Plaintiffs
 6 Michael Deatrick, et al.

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

9
 10 MICHAEL DEATRICK, individually and on
 behalf of all others similarly situated, and as
 11 representative of the State of California,

12 Plaintiff,

13 v.

14 SECURITAS SECURITY SERVICES USA,
 INC.,

15 Defendant.
 16
 17

Case No.: 3:13-cv-5016 JST

STIPULATION AND ~~PROPOSED~~
ORDER RE FILING OF AND
RESPONDING TO THIRD AMENDED
COMPLAINT

F.R.C.P. 15

18 Plaintiffs Michael Deatrick, the Opt-in Plaintiffs, and Defendant Securitas Security Services
 19 USA, Inc. (“Securitas USA”) hereby stipulate and agree as follows:

20 WHEREAS, Plaintiff filed his original Complaint in this action on October 28, 2013, and a
 21 Second Amended Complaint is the currently operative pleading;

22 WHEREAS Federal Rule of Civil Procedure 15(a) provides that leave to amend “shall be freely
 23 given when justice so requires;

24 WHEREAS Securitas USA does not oppose and agrees to the Amendment;

25 WHEREAS Securitas USA reserves all rights to challenge the pleading, and the allegations set
 26 forth therein, at the appropriate time(s).

27 IT IS THEREFORE STIPULATED AND AGREED AS FOLLOWS:

- 28 1. That Plaintiff shall be given leave to file the Third Amended Complaint submitted

1 concurrently with this stipulation; within five court days of this order.
2 ten court days thereafter

3 2. That Securitas USA shall have ~~14 days from the date of the order on this stipulation~~
4 which to Answer or otherwise respond to the Third Amended Complaint.

5 Pursuant to Local Rule 5-1(i)(3), the undersigned filer of this document hereby attests that
6 concurrence in the filing has been obtained from each of the other signatories, which shall serve in lieu
7 of their signatures on the document.

8 IT IS SO STIPULATED.

9 DATED: May 18, 2015

Respectfully submitted,

PROMETHEUS PARTNERS L.L.P.

11 By: /s/ John R. Hurley

12 John R. Hurley, Esq.

13 Attorneys for Plaintiffs Michael Deatrick, et al.

14 DATED: May 18, 2015

Respectfully submitted,

16 THARPE & HOWELL, LLP

17 By: /s/ Sherry B. Shavit

18 Sherry B. Shavit, Esq.

19 Attorneys for Defendant Securitas
20 Security Services USA, Inc.

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22 DATED: May 20, 2015

23 By:

