

SCOTT COLE & ASSOCIATES, APC  
ATTORNEYS AT LAW  
THE TOWER BUILDING  
1970 BROADWAY, NINTH FLOOR  
OAKLAND, CA 94612  
TEL: (510) 891-9800

1 Scott Edward Cole, Esq. (S.B. #160744)  
Molly A. DeSario, Esq. (S.B. #230763)  
2 Stephen Noel Ilg, Esq. (S.B. #275599)  
**SCOTT COLE & ASSOCIATES, APC**  
3 1970 Broadway, Ninth Floor  
Oakland, California 94612  
4 Telephone: (510) 891-9800  
Facsimile: (510) 891-7030  
5 Email: scole@scalaw.com  
Email: mdesario@scalaw.com  
6 Email: silg@scalaw.com  
Web: [www.scalaw.com](http://www.scalaw.com)

7 Attorneys for Representative Plaintiffs  
8 and the Plaintiff Classes

9 Dale J. Giali (Cal. Bar No. 150382)  
*dgiali@mayerbrown.com*  
10 Michael L. Resch (Cal. Bar No. 202909)  
*mresch@mayerbrown.com*

**MAYER BROWN LLP**  
12 350 South Grand Avenue, 25th Floor  
Los Angeles, CA 90071-1503  
13 Telephone: (213) 229-9500  
14 Facsimile: (213) 625-0248

15 Attorneys for Defendant  
16 VAN'S INTERNATIONAL FOODS

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

20 DANA RHINERSON and AIDIN )  
21 MORADI, individually, and on behalf )  
of all others similarly situated, )

22 Plaintiffs, )

23 vs. )

24 VAN'S INTERNATIONAL FOODS, )  
25 INC., d/b/a Van's Natural Foods, )

26 Defendant. )  
27 )  
28 )

Case No. 3:13-CV-05923 VC

**CLASS ACTION**

**STIPULATION AND ~~PROPOSED~~ ORDER  
GRANTING LEAVE TO FILE AMENDED  
COMPLAINT**

Honorable Vince Chhabria

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Pursuant to Civil Local Rule 7-12, Plaintiffs Dana Rhinerson and Aidin Moradi (“Plaintiffs”) and Defendant Van’s International Foods (“Defendant”) (collectively, “the Parties”), by and through their counsel hereby stipulate and agree as follows:

WHEREAS, on December 20, 2013, Plaintiffs filed their Complaint for Damages with this Court indentifying Van’s International Foods, Inc. as a Defendant in this action.

WHEREAS, Defendant informed Plaintiffs that its legal name does not contain “Inc.”

WHEREAS, counsel for both Parties met and conferred with respect to Defendant’s legal name.

WHEREAS, both Parties agreed that Plaintiffs should be permitted to amend the pleadings to correct Defendant’s legal name.

**THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by and between the Parties, through their respective counsel of record, as follows:

1. The Parties stipulate and agree that Plaintiffs can file their First Amended Complaint to change Defendant’s name from “Van’s International Foods, Inc.” to “Van’s International Foods,” and subject to the approval of the Court, the proposed First Amended Complaint shall be in the form attached hereto as Exhibit “A.”

2. Plaintiffs shall file their First Amended Complaint within 30 days of the date this Order is entered.

**IT IS SO STIPULATED.**

Dated: October 17, 2014

SCOTT COLE & ASSOCIATES, APC

By: /s/ Stephen Noel Ilg  
Stephen Noel Ilg  
Attorneys for Representative Plaintiffs  
and the Plaintiff Classes

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Dated: October 17, 2014

MAYER BROWN LLP

By: /s/ Dale Giali  
Dale J. Giali  
Attorneys for Defendant  
Van's International Foods

I, Stephen Noel Ilg, hereby attest, pursuant to N.D. Cal. Local Rule 5-1(i)(3) that concurrence to the filing of this document has been obtained from each signatory.

By: /s/ Stephen Noel Ilg  
Stephen Noel Ilg  
Attorneys for Representative Plaintiffs  
and the Plaintiff Classes

~~PROPOSED~~ ORDER

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: October 20, 2014

  
HONORABLE VINCE CHHABRIA  
United States District Court Judge