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Attorneys for Plaintiffs
DANA RHINERSON AND AIDIN MORADI

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

DANA RHINERSON, *et al.*,

Plaintiffs,

v.

VAN'S INTERNATIONAL FOODS

Defendant.

Case No. 3:13-cv-05923

The Honorable Vince Chhabria

**STIPULATION AND ~~PROPOSED~~
ORDER TO DEEM DEFENDANT
VAN'S INTERNATIONAL FOOD'S
ANSWER TO PLAINTIFF'S
COMPLAINT APPLICABLE TO
PLAINTIFF'S FIRST AMENDED
COMPLAINT**

1 Pursuant to Civil Local Rule 7-12, Plaintiffs Dana Rhinerson and Aidin Moradi (“plaintiffs”)
2 and Defendant Van’s International Foods (“Van’s”), by and through their attorneys of record,
3 stipulate as follows:

4 WHEREAS, on July 16, 2014, Van’s filed an Answer to plaintiffs’ complaint.

5 WHEREAS, on October 22, 2014, plaintiffs filed a First Amended Complaint solely to
6 correct Van’s legal name to not contain the entity designation “Inc.”

7 WHEREAS, counsel for both Parties met and conferred with respect to Van’s Answer to the
8 First Amended Complaint.

9 WHEREAS, both parties agreed that Van’s previously-filed Answer should be deemed to
10 apply to plaintiffs’ First Amended Complaint.

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

13 1. Defendant Van’s International Foods (Van’s) shall not be required to answer
14 plaintiffs’ First Amended Complaint, filed on October 22, 2014, ECF No. 67. In addition, all
15 denials, responses, and affirmative defenses contained in Van’s Answer, filed on July 16, 2014, ECF
16 No. 54, shall be deemed to be Van’s denials, responses, and affirmative defenses to the First
17 Amended Complaint.

18
19 **IT IS SO STIPULATED.**

20 DATED: November 25, 2014

By: /s/ Stephen Noel Ilg

22 SCOTT EDWARD COLE
23 MOLLY A. DESARIO
24 STEPHEN NOEL ILG

25 Attorneys for Plaintiffs
26 DANA RHINERSON AND AIDIN MORADI
27
28

1 DATED: November 25, 2014

By: s/ Dale J. Giali

2 DALE J. GIALI
3 MICHAEL L. RESCH

4 Attorneys for Defendant
5 VAN'S INTERNATIONAL FOODS.

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

8 By: s/ Dale J. Giali


9 DALE J. GIALI

10 Attorney for Defendant
11 VAN'S INTERNATIONAL FOODS.

12
13 **PROPOSED ORDER**

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

15 DATED: November 26, 2014

16 
17 HON. VINCE CHHABRIA
18 United States District Judge