

1 **STIPULATION**

2 In accordance with Fed. R. Civ. P. 15 and the Court’s August 18, 2015 Order (Docket
3 Entry No. 30), Plaintiffs Christopher O’Halloran, Devon Oliver, and Davion McFarland and
4 Defendant GCA Services Group of Texas, LP (erroneously sued as GCA Services Group, Inc.)
5 stipulate and agree as follows:
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7 (1) On February 26, 2015, Plaintiffs filed their Original Complaint which named
8 GCA Services Group, Inc., who on Plaintiffs’ information and belief was Plaintiffs’
9 presumptive employer, as the only Defendant to this action. See Docket, Document Number 1.
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11 (2) On June 23, 2015, Plaintiffs filed a Motion for Leave of Court to File Amended
12 Complaint. See Docket, Document Number 26.

13 (3) Plaintiffs’ Motion requests leave of Court to file an Amended Complaint that
14 includes GCA Services Group of Texas, LP as a Defendant on the grounds that, on Plaintiffs’
15 information and belief, this entity was also Plaintiffs’ presumptive employer. Id.
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17 (4) Plaintiffs submitted a proposed amended complaint with their Motion. Id., Ex. 1.

18 (5) Defendant has not opposed, and does not oppose the relief requested through
19 Plaintiffs’ Motion.
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21 WHEREFORE, IT IS HEREBY STIPULATED between the Parties and their respective
22 counsel that Plaintiffs should be granted leave of Court to file the First Amended Complaint that
23 was submitted with Plaintiffs’ Motion.
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1 Date: August 21, 2015

Respectfully submitted,

2 LAW OFFICES OF JOSEPH ALIOTO AND ANGELA
3 ALIOTO

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5 By: /s/ Matthew J. Wayne
6 Matthew J. Wayne
7 Attorneys for Plaintiffs

8 CAROTHERS DISANTE & FREUDENBERGER LLP
9 By: /s/ Jeremy T. Naftel
10 Jeremy T. Naftel
11 Attorneys for Defendant
12 GCA Services Group of Texas, LP

13 **LOCAL RULE 5-1 ATTESTATION**

14 In accordance with U.S. District Court for the Northern District of California Civil
15 Local Rule 5-1(i)(3), the filing attorney attests that concurrence in the filing of this document
16 has been obtained from each of the other Signatories, which shall serve in lieu of their
17 signatures on the document. The filing attorney will maintain records to support this
18 concurrence for subsequent production for the Court, if so ordered, or for inspection upon
19 request by a party, until one year after the final resolution of the action (including appeal, if
20 any).
21

22 Date: August 21, 2015

LAW OFFICES OF JOSEPH ALIOTO AND ANGELA
23 ALIOTO


24 By: /s/ Matthew J. Wayne
25 Matthew J. Wayne
26 Attorneys for Plaintiffs
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1 **ORDER**

2 The Court having reviewed the foregoing Stipulation, and good cause appearing
3 therefore:

4 **IT IS HEREBY ORDERED** that Plaintiffs Christopher O'Halloran, Devon Oliver, and
5 Davion McFarland are granted leave of Court to file the First Amended Complaint that was
6 submitted with their original Motion for Leave of Court to File First Amended Complaint.
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10 Signed this _____ 21st day of _____ August, 2015.

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14 Honorable Haywood S. Gilliam, Jr.
15 UNITED STATES DISTRICT JUDGE
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