

DISTRICT COURT
ICT OF CALIFORNIA
CASE NO. 15-CV-1286-EMC
STIPULATION AND [PROPOSED] ORDER FOR WITHDRAWAL OF PAUI
HASTINGS LLP AS COUNSEL FOR
DEFENDANT HOMEJOY, INC.
CIVIL LOCAL RULES 7-12 & 11-5
Judge: Hon. Edward M. Chen. Department: 5
Complaint Filed: March 19, 2015 Trial Date: None set

STIPULATION AND [PROPOSED] ORDER FOR WITHDRAWAL OF PAUL HASTINGS LLP AS COUNSEL FOR DEFENDANT HOMEJOY, INC.

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STIPULATION

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Defendant Homejoy, Inc. ("Homejoy"), and the law firm of Paul Hastings LLP ("Paul Hastings") hereby stipulate as follows:

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Whereas, Paul Hastings has represented Homejoy in this action;

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Whereas, Homejoy now knowingly and freely assents to Paul Hastings' withdrawal from the action, and withdrawal is permissible under Rule 3-700(C) of the California Rules of

Whereas, Paul Hastings has taken reasonable steps to avoid reasonably foreseeable

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Professional Conduct;

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prejudice to the rights of Homejoy pursuant to Rule 3-700(A)(2) of the California Rules of

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Professional Conduct, including giving due notice to Homejoy and allowing time for search of

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new counsel;

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Whereas, Homejoy and Paul Hastings acknowledge that papers may continue to be served

Whereas, Paul Hastings will promptly and fully comply with Rule 3-700(D) of the

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on Paul Hastings for forwarding purposes, unless and until Homejoy appears by other counsel;

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California Rules of Professional Conduct and cooperate with successor counsel to ensure a

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smooth transition and to avoid any prejudice to Homejoy;

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court actions, Zenelaj, et al. v. Homejoy, Inc., Case No. CGC-15-544599 (San Francisco Superior

Whereas, Paul Hastings has also represented Homejoy in three pending California state

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Court); Ventura, et al. v. Homejoy, Inc., Case No. CGC-15-544750 (San Francisco Superior

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Court); and Malveaux-Smith, et al. v. Homejoy, Inc., Case No. 37-2015-00005070-CU-OE-CTL

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(San Diego Superior Court); and on July 15, 2015, Paul Hastings filed an Ex Parte Application to

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Withdraw from Representation of Defendant Homejoy, Inc., or in the Alternative, to Shorten

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Time to Hear Motion to Withdraw ("Ex Parte Application") in all three cases;

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Whereas, on July 16, 2015, all three *Ex Parte* Applications were heard, and the San Francisco Superior Court granted Paul Hastings' motions to withdraw in *Zenelaj* and *Ventura*,

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and the San Diego Superior Court scheduled the motion to withdraw hearing for August 7, 2015,

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7 in Malveaux-Smith;

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1	Whereas, all parties to this action are notified of this withdrawal through the electronic
2	filing of this stipulation and proposed order;
3	IT IS THEREFORE STIPULATED, pursuant to Rules 7-12 and 11-5 of the Civil Local
4	Rules of the United States District Court for the Northern District of California, that Paul
5	Hastings may and hereby does withdraw as counsel for Homejoy in this action.
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7	DATED: July <u>d</u> , 2015 Respectfully submitted,
8	PAUL HASTINGS LLP
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10	By: ZACHARY P. HUTTON
11	Attorneys for Defendant
12	Homejoy, Inc.
13	DATED: July 21, 2015 Respectfully submitted,
14	HOMEJOY, INC.
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16	By:ADORA CHEUNG
17	CEO, Homejoy, Inc.
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19	[PROPOSED] ORDER
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21	PURSUANT TO STIPULATION, IT IS SO ORDERED
22	ATES DISTRICT
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24	DATED: July 27, 2015 . Granted in light of
25	Homejoy's filing at Docket
26	No. 27. Judge Edward M. Chen Judge Edward M. Chen
27	Judge of Juned States District Court
28	STIPULATION CANDED ROPOS POLOR DER FOR
	STIPULATIONS TO POSED OR OF THE STIPULATION OF THE

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WITHDRAWAL OF PACE HASTINGS LLP AS COUNSEL FOR DEFENDANT HOMEJOY, INC.