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Attorneys for Defendant  
WIRELESS LIFESTYLE, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

DAMON CARDINALLI, ROBERT  
CRANDALL, RENE FRAGOSO, DANIEL  
GUERRERO, NISHELL JOHNSON, DAISY  
LARIOS, SHANNON LAW, PAULINE  
MARTINEZ, JEFFREY MONROY, SENG  
SAEPHAN, MICHAEL SANTOS, SARAH  
SCOTT, ERNESTO SEGOVIA, ROBERT  
RAMIREZ, NICKOLAS ROSS, and STEVEN  
GIRARD, as individuals and in their  
representative capacity,

Plaintiffs,

v.

WIRELESS LIFESTYLE, INC., a corporation,  
and WIRELESS LIFESTYLE, LLC, a limited  
liability company,

Defendants.

Case No. 3:15-cv-05268-HSG

**JOINT STIPULATION AND ORDER  
FOR LEAVE TO FILE SECOND  
AMENDED COMPLAINT**

/ Complaint Filed: November 17, 2015

1 Plaintiffs Damon Cardinalli, Robert Crandall, Rene Fragoso, Daniel Guerrero, Nishell  
2 Johnson, Daisy Larios, Shannon Law, Pauline Martinez, Jeffrey Monroy, Seng Saephan, Michael  
3 Santos, Sarah Scott, Ernesto Segovia, Robert Ramirez, Nickolas Ross, and Steven Girard  
4 (“Plaintiffs”), and Defendants Wireless Lifestyle, Inc. and Wireless Lifestyle, LLC  
5 (“Defendants”), by and through their attorneys of record, hereby stipulate and agree as follows:

6 WHEREAS, Plaintiffs filed their initial complaint on November 15, 2015;

7 WHEREAS, the parties stipulated on January 6, 2016, to Plaintiffs filing a First Amended  
8 Complaint primarily for purposes of alleging exhaustion of the administrative requirements  
9 pursuant to the Private Attorneys General Act (“PAGA”), which stipulation was granted by order  
10 dated January 13, 2016;

11 WHEREAS, Plaintiffs seek to add an additional Plaintiff, Steven Girard, to pursue claims  
12 for unfair business practices under California Business and Professionals Code Section 17200  
13 based on unpaid overtime and meal break violations and unreimbursed business expenses, which  
14 claims are already set forth in the First Amended Complaint and are substantially the same as the  
15 other Plaintiffs’ claims for unfair business practices under California Business and Professionals  
16 Code Section 17200;

17 WHEREAS, Plaintiffs also seek to add an additional Defendant, Wireless Lifestyle, LLC;

18 WHEREAS, the first Case Management Conference was held on March 1, 2016, where  
19 the parties discussed their plan to mediate the case on May 4;

20 WHEREAS no deadlines or trial date have yet been established in this case;

21 The Parties, through their undersigned representative counsel of record, hereby stipulate that  
22 Plaintiffs shall have leave to file a Second Amended Complaint in this lawsuit primarily for

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1 purposes of adding Plaintiff Steven Girard and Defendant Wireless Lifestyle, LLC. A copy of  
2 the Proposed Second Amended Complaint is attached hereto as Exhibit A.

3  
4 Respectfully submitted,

5 Dated: March 10, 2016

6 /s/ Lonnie D. Giamela  
LONNIE D. GIAMELA  
7 SHAUN J. VOIGT  
FISHER & PHILLIPS LLP  
8 Attorneys for Defendant  
WIRELESS LIFESTYLE, INC.

9 Dated: March 10, 2016

10 /s/ Steven G. Zieff  
STEVEN G. ZIEFF  
11 JOHN T. MULLAN  
MICHELLE G. LEE  
12 RUDY EXELROD ZIEFF & LOWE LLP  
Attorneys for Plaintiffs

13  
14 **ECF ATTESTATION**

15 Pursuant to Civil L.R. 5-1(i)(3), the filer attests that concurrence in the filing of this  
16 document has been obtained from each of the other signatories thereto.

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18  
19 **ORDER**

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

21  
22 Dated: March 14, 2016

23 Haywood S. Gilliam, Jr.  
HON. HAYWOOD S. GILLIAM, JR.  
24 United States District Court  
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