

1 Michael P. Esser (SBN 268634)  
 2 KIRKLAND & ELLIS LLP  
 3 555 California Street  
 4 San Francisco, CA 94104  
 Telephone: (415) 439-1400  
 Facsimile: (415) 439-1500  
 Email: [michael.esser@kirkland.com](mailto:michael.esser@kirkland.com)

5 Emily Nicklin (admitted pro hac vice)  
 6 Gabor Balassa (admitted pro hac vice)  
 7 Christina Breisacher (admitted pro hac vice)  
 8 KIRKLAND & ELLIS LLP  
 9 300 N. LaSalle  
 10 Chicago, IL 60654  
 Telephone: (312) 862-2400  
 Facsimile: (312) 862-2200  
 Email: [enicklin@kirkland.com](mailto:enicklin@kirkland.com)  
 Email: [gabor.balassa@kirkland.com](mailto:gabor.balassa@kirkland.com)  
 Email: [christina.breisacher@kirkland.com](mailto:christina.breisacher@kirkland.com)

11 Attorneys for Defendant  
 12 PRICEWATERHOUSECOOPERS LLP

13 **UNITED STATES DISTRICT COURT**  
 14 **NORTHERN DISTRICT OF CALIFORNIA**  
 15 **SAN FRANCISCO DIVISION**

16 STEVE RABIN, on behalf of himself, and all others  
 17 similarly situated,  
 18 Plaintiff,  
 19 v.  
 20 PRICEWATERHOUSECOOPERS LLP,  
 21 Defendant.

Jahan C. Sagafi (Cal. Bar No. 224887)  
 Katrina L. Eiland (Cal. Bar No. 275701)  
 Julia Rabinovich (Cal. Bar No. 290730)  
 OUTTEN & GOLDEN LLP  
 One Embarcadero Center, 38th Floor  
 San Francisco, CA 94111  
 Telephone: (415) 638-8800  
 Facsimile: (415) 638-8810  
 E-mail: [jsagafi@outtengolden.com](mailto:jsagafi@outtengolden.com)  
 E-mail: [keiland@outtengolden.com](mailto:keiland@outtengolden.com)  
 E-mail: [jrabinovich@outtengolden.com](mailto:jrabinovich@outtengolden.com)

[Additional counsel listed on next page]

Attorneys for Plaintiff and Proposed Class  
 and Collective Members

CASE NO. 3:16-cv-02276-JST

Hon. Jon S. Tigar

**JOINT STIPULATION & [PROPOSED]**  
**ORDER TO FILE FIRST AMENDED**  
**COMPLAINT**

1 Adam T. Klein (admitted pro hac vice)  
2 OUTTEN & GOLDEN LLP  
3 3 Park Avenue, 29th Floor  
4 New York, NY 10016  
5 Telephone: (212) 245-1000  
6 Facsimile: (646) 509-2060  
7 Email: [atk@outtengolden.com](mailto:atk@outtengolden.com)

8 Daniel Kohrman (admitted pro hac vice)  
9 Laurie McCann (admitted pro hac vice)  
10 Dara Smith (admitted pro hac vice)  
11 AARP FOUNDATION LITIGATION  
12 601 E. Street, N.W.  
13 Washington, D.C. 20049  
14 Telephone: (202) 434-2060  
15 Facsimile: (202) 434-2082  
16 E-mail: [dkohrman@aarp.org](mailto:dkohrman@aarp.org)  
17 E-mail: [lmccann@aarp.org](mailto:lmccann@aarp.org)  
18 E-mail: [dsmith@aarp.org](mailto:dsmith@aarp.org)

19 Jennifer L. Liu (Cal. Bar No. 279370)  
20 THE LIU LAW FIRM, P.C.  
21 1170 Market Street, Suite 700  
22 San Francisco, CA 94102  
23 Telephone: (415) 896-4260  
24 Facsimile: (415) 231-0011  
25 E-mail: [jliu@liulawpc.com](mailto:jliu@liulawpc.com)

1 Plaintiff Steve Rabin (“Plaintiff”) and Defendant PricewaterhouseCoopers LLP (“PwC” or  
2 “Defendant”) hereby stipulate and agree as follows:

3 WHEREAS, Plaintiff wishes to amend Plaintiff’s class and collective action complaint to add  
4 John Chapman as a proposed Class Representative asserting age discrimination claims under  
5 Michigan state law on behalf of himself and proposed Class of applicants to PwC aged 40 years or  
6 older from that state;

7 WHEREAS, Plaintiff also wishes to amend Plaintiff’s complaint to add a claim under  
8 California’s Unfair Competition Law, California Business & Professions Code §§ 17200, et seq.;  
9 and,

10 WHEREAS, these amendments will not substantially change the core nucleus of factual  
11 allegations or scope of discovery.

12 THEREFORE, IT IS HEREBY STIPULATED that Plaintiff may file the First Amended  
13 Complaint, attached hereto as Exhibit A.

14  
15 Dated: September 2, 2016

16 /s/ Jahan C. Sagafi

/s/ Emily Nicklin

17 Jahan C. Sagafi (Cal. Bar No. 224887)  
18 Katrina L. Eiland (Cal. Bar No. 275701)  
19 Julia Rabinovich (Cal. Bar No. 290730)  
20 OUTTEN & GOLDEN LLP  
21 One Embarcadero Center, 38th Floor  
22 San Francisco, CA 94111-3339  
23 Telephone: (415) 638-8800  
24 Facsimile: (415) 638-8810  
25 Email: [jsagafi@outtengolden.com](mailto:jsagafi@outtengolden.com)  
26 Email: [keiland@outtengolden.com](mailto:keiland@outtengolden.com)  
27 Email: [jrabinovich@outtengolden.com](mailto:jrabinovich@outtengolden.com)

Emily Nicklin (pro hac vice)  
Gabor Balassa (pro hac vice)  
Christina Breisacher (pro hac vice)  
KIRKLAND & ELLIS LLP  
300 N. LaSalle  
Chicago, IL 60654  
Telephone: (312) 862-2400  
Facsimile: (312) 862-2200  
Email: [enicklin@kirkland.com](mailto:enicklin@kirkland.com)  
Email: [gabor.balassa@kirkland.com](mailto:gabor.balassa@kirkland.com)  
Email: [christina.briesacher@kirkland.com](mailto:christina.briesacher@kirkland.com)

24 Adam T. Klein (admitted pro hac vice)  
25 OUTTEN & GOLDEN LLP  
26 3 Park Avenue, 29th Floor  
27 New York, NY 10016  
28 Telephone: (212) 245-1000  
Facsimile: (646) 509-2060  
Email: [atk@outtengolden.com](mailto:atk@outtengolden.com)

Michael P. Esser (SBN 268634)  
KIRKLAND & ELLIS LLP  
555 California Street  
San Francisco, CA 94104  
Telephone: (415) 439-1400  
Facsimile: (415) 439-1500  
Email: [michael.esser@kirkland.com](mailto:michael.esser@kirkland.com)

Daniel Kohrman (admitted pro hac vice)

Attorneys for Defendant

1 Laurie McCann (admitted pro hac vice)  
2 Dara Smith (admitted pro hac vice)  
3 AARP FOUNDATION LITIGATION  
4 601 E. Street, N.W.  
5 Washington, D.C. 20049  
6 Telephone: (202) 434-2060  
7 Facsimile: (202) 434-2082  
8 E-mail: [dkohrman@aarp.org](mailto:dkohrman@aarp.org)  
9 E-mail: [lmccann@aarp.org](mailto:lmccann@aarp.org)  
10 E-mail: [dsmith@aarp.org](mailto:dsmith@aarp.org)

PRICEWATERHOUSECOOPERS LLP

11 Jennifer L. Liu (Cal. Bar No. 279370)  
12 THE LIU LAW FIRM, P.C.  
13 1170 Market Street, Suite 700  
14 San Francisco, CA 94102  
15 Telephone: (415) 896-4260  
16 Facsimile: (415) 231-0011  
17 E-mail: [jliu@liulawpc.com](mailto:jliu@liulawpc.com)

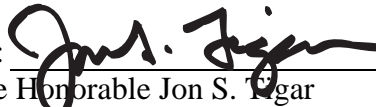
18 Attorneys for Plaintiff and Proposed Class  
19 and Collective Members  
20  
21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

It is so ORDERED.

Dated: September 7, 2016

By:   
The Honorable Jon S. Tigar  
UNITED STATES DISTRICT JUDGE

**ATTESTATION PURSUANT TO CIVIL L.R. 5-1(i)(3)**

I, Jahan C. Sagafi, am the ECF User whose ID and password are being used to file this document. I hereby attest that concurrence in the filing of this document has been obtained from the signatories.

Dated: September 2, 2016

By: /s/ Jahan C. Sagafi  
Jahan C. Sagafi