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14 Attorneys for Defendant  
 U.S. AVIATION SERVICES CORP.  
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16 UNITED STATES DISTRICT COURT  
 17 NORTHERN DISTRICT OF CALIFORNIA  
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19 JAMES HARALSON, on behalf of himself and  
 others similarly situated,  
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 Plaintiff,  
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 v.  
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 U.S. AVIATION SERVICES CORP., a Nevada  
 23 corporation; UNITED AIRLINES, INC., a  
 Delaware corporation; and DOES 1-50,  
 24 inclusive,  
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 Defendants.  
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Case No. 3:16-cv-05207

**PLAINTIFF JAMES HARALSON'S  
 AND DEFENDANT U.S. AVIATION  
 SERVICES CORP.'S STIPULATION  
 FOR AN ORDER COMPELLING THE  
 PRODUCTION OF A CLASS LIST**

STIPULATION FOR AN ORDER  
 COMPELLING THE PRODUCTION OF A  
 CLASS LIST

1 IT IS HEREBY STIPULATED by and between Plaintiff James Haralson (“Plaintiff”) and  
2 Defendant U.S. Aviation Services Corp. (“U.S. Aviation”) (collectively the “Parties”) by and  
3 through their respective counsel of record, that:

4 WHEREAS, on December 7, 2016, Plaintiff propounded an Interrogatory on U.S.  
5 Aviation requesting it to provide the name, mailing address, cellular telephone number, email  
6 address and job title for each putative class member (hereafter known as a request for a “Class  
7 List”);

8 WHEREAS, on April 4, 2017, U.S. Aviation objected to Plaintiff’s Interrogatory  
9 primarily on the grounds that such a request for a Class List is premature prior to Plaintiff  
10 satisfying his *prima facie* burden showing that the Federal Rule of Civil Procedure 23 class action  
11 requirements are met and the dissemination of a Class List violates the privacy rights of U.S.  
12 Aviation former and current employees;

13 WHEREAS, on April 11, 2017, Plaintiff sent U.S. Aviation a meet and confer letter  
14 arguing its position as to why U.S. Aviation’s initial discovery response was deficient;

15 WHEREAS, on April 28, 2017, after the Parties engaged in good faith meet and confer  
16 discussions, and based on the legal authorities presented by Plaintiff U.S. Aviation agreed to  
17 produce the requested Class List subject to an Order from this Court requiring it do so;

18 THEREFORE, the parties hereby stipulate and jointly request that the Court enter this  
19 Order requiring U.S. Aviation to produce a Class List and instructing Plaintiff’s counsel to protect  
20 the privacy interest of putative class members as follows:

- 21 1. U.S. Aviation is required to produce the name, last known mailing address, last  
22 known cellular telephone number if in possession of U.S. Aviation, last known  
23 personal email address if in possession of U.S. Aviation and last known job title  
24 held at U.S. Aviation for each putative class member, with putative class member  
25 defined as all persons employed by Defendant U.S. Aviation Services Corp. in  
26 hourly paid or non-exempt positions as aircraft cleaners in California since  
27 September 9, 2012;

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2. Unless the Parties agree to a different date, the deadline for U.S. Aviation to produce the Class List shall be within thirty (30) days of the entry of this Court's order;

3. Plaintiff's counsel must inform each putative class member that Plaintiff's counsel contacts that he or she has a right not to talk to Plaintiff's counsel and that, if he or she declines to talk with Plaintiff's counsel, Plaintiff's counsel will immediately terminate the conversation and will not contact that individual again.

Dated: June 15, 2017

SETAREH LAW GROUP

By: /s/ H. Scott Leviant

Shaun Setareh  
Thomas Segal  
H. Scott Leviant

Attorneys for Plaintiff  
JAMES HARALSON

Dated: June 15, 2017

VEDDER PRICE (CA), LLP

By: /s/ Christopher A. Braham

Brendan Dolan  
Christopher A. Braham

Attorneys for Defendant  
U.S. AVIATION SERVICES, CORP.

**ORDER**

Good cause appearing therefor, IT IS SO ORDERED.

Dated: June 19, 2017

  
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THE HONORABLE JON S. TIGAR

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**ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)**

I, Christopher A. Braham, attest that concurrence in the filing of this stipulation has been obtained from all signatories.

Executed this 15th day of June 2017, in Los Angeles, California.

/s/ Christopher A. Braham  
Christopher A. Braham