

LAWYERS for JUSTICE, PC 410 West Arden Avenue, Suite 203 Glendale, California 91203

IT IS HEREBY STIPULATED by and between Plaintiff Chantae Young ("Plaintiff"), 1 2 by and through her counsel of record, and Defendant Novartis Pharmaceuticals Corporation ("Defendant"), by and through its counsel of record, as follows: 3

WHEREAS, on June 23, 2017, Plaintiff, individually, and on behalf of other members of the public similarly situated, filed a wage and hour class action lawsuit in the Superior Court of California, County of San Mateo against Defendant;

WHEREAS, on August 2, 2017, Defendant removed this case to the United States 7 District Court for the Northern District of California; 8

WHEREAS, on August 16, 2017, the parties met and conferred regarding Defendant's 9 intention to file a motion to dismiss Plaintiff's complaint pursuant to Federal Rule of Civil 10 Procedure ("Rule") 12(b)(6); 11

WHEREAS, Plaintiff agreed to amend her Complaint to attempt to address Defendant's concerns and avoid motion practice;

WHEREAS, while Defendant is reviewing, and continues to have concerns regarding, certain aspects of the proposed amended complaint, Defendant has agreed not to object to Plaintiff's filing of the same, subject to its reservation of rights to answer or to otherwise respond (including, but not limited to, the filing of a motion under Rule 12(b), (e), or (f)) to the amended complaint; and 18

WHEREAS, a copy of Plaintiff's "[Proposed] First Amended Class Action Complaint 19 for Damages" is attached hereto as Exhibit A; 20

21 Now, therefore the parties agree and stipulate pursuant to Federal Rule of Civil Procedure 15(a)(2) to the filing of the attached Plaintiff's First Amended Class Action Complaint, subject 22 to Defendant's reservation of rights to answer or to otherwise respond (including, but not limited 23 to, the filing of a motion under Rule 12(b), (e), or (f)) to the proposed amended complaint. 24

LAWYERS for JUSTICE, PC 410 West Arden Avenue, Suite 203 Glendale, California 91203 13 14 15 16 17

4

5

6

12

///

///

///

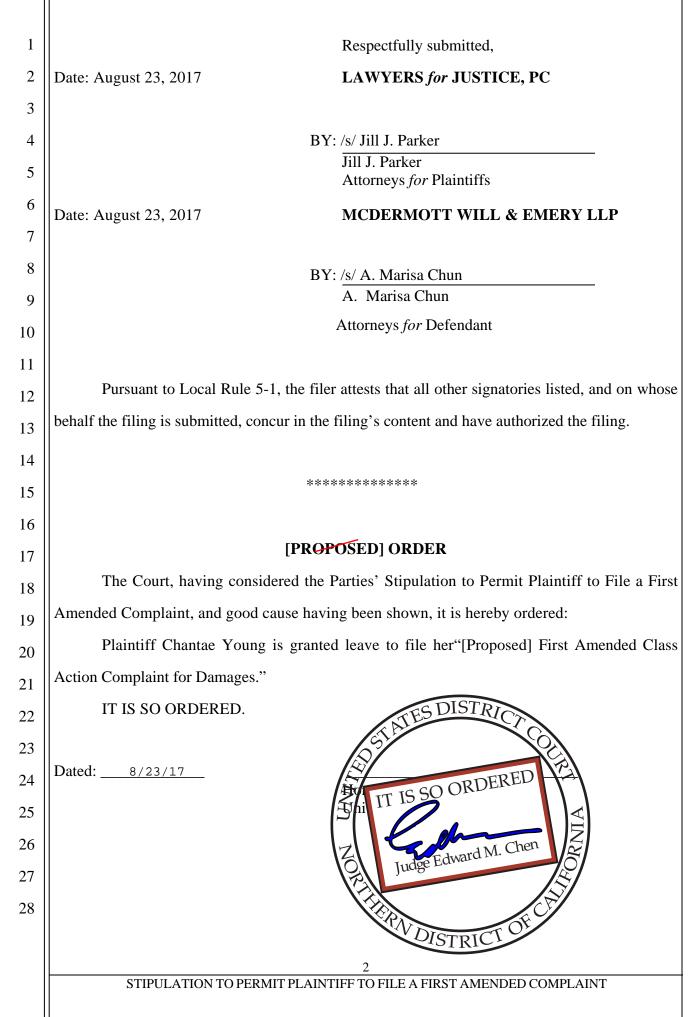
///

25

26

27

28



LAWYERS *for* JUSTICE, PC 410 West Arden Avenue, Suite 203 Glendale, California 91203