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7 *Attorneys for Plaintiff*

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHANTAE YOUNG, individually, and on
 behalf of other members of the general public
 similarly situated;

 Plaintiff,

 vs.

 NOVARTIS PHARMACEUTICALS
 CORPORATION, an unknown business entity;
 and DOES 1 through 100, inclusive,

 Defendants.

Case No.: 3:17-cv-04390-EMC
 Honorable Edward M. Chen

**STIPULATION TO PERMIT PLAINTIFF
 TO FILE A FIRST AMENDED
 COMPLAINT AND ~~PROPOSED~~
 ORDER**

Complaint Filed: June 23, 2017
 Trial Date: Not Set

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

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

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

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

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

12 **WHEREAS**, Plaintiff agreed to amend her Complaint to attempt to address Defendant’s
13 concerns and avoid motion practice;

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

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

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

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Respectfully submitted,

Date: August 23, 2017

LAWYERS for JUSTICE, PC

BY: /s/ Jill J. Parker

Jill J. Parker
Attorneys for Plaintiffs

Date: August 23, 2017

MCDERMOTT WILL & EMERY LLP

BY: /s/ A. Marisa Chun

A. Marisa Chun
Attorneys for Defendant

Pursuant to Local Rule 5-1, the filer attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

[~~PROPOSED~~] ORDER

The Court, having considered the Parties' Stipulation to Permit Plaintiff to File a First Amended Complaint, and good cause having been shown, it is hereby ordered:

Plaintiff Chantae Young is granted leave to file her "[Proposed] First Amended Class Action Complaint for Damages."

IT IS SO ORDERED.

Dated: 8/23/17

