

1 BEN DUPRE, Bar No. 231191
2005 De La Cruz Bld., Suite 203
2 Santa Clara, CA 95050
3 Tel: 408-727-5377
4 Fax: 408-727-5310

4 RONALD WILCOX, Bar No. 176601
1900 The Alameda Ste, 530
5 San Jose, CA 95126
6 Tel: 408-296-0400
7 Fax: 408-296-0486

7 Counsel for the Plaintiff
EDWARD HAAS

9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA –**
11 **(SAN FRANCISCO/OAKLAND DIVISION)**

12 EDWARD HAAS,

13 Plaintiff,

14 v.

15 CITIBANK, N.A., REGIONAL
16 ADJUSTMENT BUREAU, INC., MERIUM
17 DOE, MARIA DOE, PEARL DOE, JAMES
18 DOE, VICTORIA DOE, and DOES 1 through
20, inclusive

19 Defendants.

) Case No.: CV13-01578 KAW

) **STIPULATION TO ARBITRATE and**
) **ORDER**

20
21 TO THE COURT, ALL PARTIES IN INTEREST AND THEIR ATTORNEYS OF RECORD:

22 WHEREAS, plaintiff, Edward Haas (“Plaintiff”), on the one hand, and defendants,
23 Citibank N.A. (“Citibank”) on the other hand, have agreed to stipulate to an order compelling the
24 instant dispute to binding arbitration before JAMS, San Jose division.

25 THEREFORE, IT IS HEREBY STIPULATED BY AND BETWEEN PLAINTIFF, AND
CITIBANK, N.A., THROUGH THEIR COUNSEL OF RECORD, THAT:

STIPULATION TO ARBITRATE and [Proposed] ORDER

1 1. The instant dispute is compelled to binding arbitration before JAMS pursuant to the
2 terms of the Card Agreement (a copy of which is attached hereto as Exhibit "1").

3 2. Plaintiff and Citibank shall pay the arbitration fees and costs as required by JAMS.

4 3. Plaintiff will initiate an arbitration with JAMS within 10 days of this Court's order,
5 and Citibank agrees to pay its portion of any fees as directed by, and in accordance with the rules
6 of, JAMS after Citibank receives notice from JAMS that Plaintiff's arbitration demand has been
7 accepted.

8 4. The instant action is stayed pending notification of the outcome of the arbitration
9 proceedings.

10 4. The Court shall retain jurisdiction for the purpose of enforcing this Stipulation and
11 entering judgment upon the award of the arbitrator.

12 IT IS SO STIPULATED:

13 7/29/13 /s/Ronald Wilcox
14 Date Ronald Wilcox, Counsel for Plaintiff

15 7/29/13 /s/Marcos Sasso
16 Date Marcos Sasso, Counsel for Defendant Citibank, N.A.

17 **ORDER**

18 The court hereby adopts the stipulation of the parties.

19 **IT IS SO ORDERED.**

20 Date:7/30/13

21 
22 _____
U.S. DISTRICT JUDGE