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13 Attorneys for Defendant Urban Outfitters Wholesale, Inc.
 d/b/a Anthropologie

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION

16 ALEXANDER MOORE, individually,
 17 and on behalf of other members of the
 18 general public similarly situated,

19 Plaintiff,

20 vs.

21 URBAN OUTFITTERS WHOLESALE,
 INC., D/B/A ANTHROPOLOGIE, a
 22 Pennsylvania corporation; and DOES 1
 through 10, inclusive,

23 Defendants.

Case No.: CV 13-2245-JSW

Related Case Nos.: 13-cv-02628-JSW;
 13-cv-03184-JSW; 14-cv-00024-JSW;
 14-cv-01580-JSW; 14-002601-JSW

[Assigned to Hon. Jeffrey S. White]

**STIPULATION PERMITTING
 PLAINTIFF TO FILE FIRST
 AMENDED COMPLAINT AND
 TAKING OFF CALENDAR
 PLAINTIFF’S PENDING MOTION
 FOR LEAVE TO AMEND
 AND ORDER THEREON**
Hearing on Plaintiff’s Motion for Leave

Date: August 7, 2015
 Time: 9:00 a.m.
 Place: Courtroom 5

Complaint Filed: June 4, 2013
 Removed: August 2, 2013

1 Plaintiff Alexander Moore and Defendant Urban Outfitters Wholesale, Inc.
2 d/b/a Anthropologie (collectively, the “Parties”), by and through their respective counsel
3 of record, stipulate and agree as follows:

4 **WHEREAS**, on June 23, 2015, Plaintiff filed his Motion for Leave to File First
5 Amended Complaint (“Motion for Leave”), seeking to add an additional plaintiff to the
6 action, a claim under the Private Attorneys General Act of 2004, Cal. Labor Code
7 sections 2698, et seq. (“PAGA”), a claim for forfeiture of vacation pay, and other
8 amendments to clarify his claims;

9 **WHEREAS**, Plaintiff’s Motion for Leave is fully briefed and scheduled to be
10 heard on August 7, 2015;

11 **WHEREAS**, on July 31, 2015, the Parties reached a tentative settlement that
12 was put on the record;

13 **WHEREAS**, in the interest of judicial efficiency and economy of resources and
14 in light of having reached a tentative settlement, the Parties hereby **STIPULATE AND**
15 **AGREE** and respectfully request that Plaintiff be permitted to file his First Amended
16 Complaint.¹ The Parties also **STIPULATE and AGREE** and respectfully request that
17 Defendant’s deadline to respond to the First Amended Complaint be stayed in light of
18 the pending settlement. The Parties further **STIPULATE and AGREE** and
19 respectfully request that the August 7, 2015 hearing on Plaintiff’s Motion for Leave be
20 taken off calendar.

21 **IT IS SO STIPULATED.**

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¹ Doc. 114–1, Exh. A (First Amended Class Action Complaint & Enforcement Under the Private Attorneys General Act, California Labor Code §§ Et. Seq.).

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Dated: August 5, 2015

Respectfully submitted,
Capstone Law APC

By: /s/ Raul Perez
Raul Perez
Melissa Grant
Arnab Banerjee
Suzy E. Lee

Attorneys for Plaintiff Alexander Moore

Dated: August 5, 2015

Respectfully submitted,
DRINKER BIDDLE & REATH LLP

By: /s/ Jaime D. Walter
Cheryl D. Orr
Jaime D. Walter

Attorneys for Defendant Urban Outfitters
Wholesale, Inc. d/b/a Anthropologie

Attestation Pursuant to Local Rule 5.1(i)

Pursuant to Local Rule 5.1(i), I, Jaime D. Walter, hereby attest that I have obtained concurrence in the filing of this document from all other signatories to this document.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct. Executed on August 5, 2015, in San Francisco, California.

/s/ Jaime D. Walter
Jaime D. Walter

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: August 5, 2015


THE HONORABLE JEFFREY S. WHITE

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