

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

CARLOS VAZQUEZ, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 GROUPON, INC., )  
 600 West Chicago Avenue, )  
 Suite 620, )  
 Chicago, IL 60654; )  
 )  
 YMCA of the USA, )  
 101 North Wacker Drive, )  
 Chicago, IL 60606; and )  
 )  
 DOES 1 through 100, )  
 )  
 Defendants. )

Case No. 1:11-cv-00495 (EGS)

**NOTICE OF ENTRY OF APPEARANCE**

TO THE CLERK OF THE COURT:

Please enter the appearance of the undersigned, Sara Z. Moghadam, as counsel for Groupon, Inc. and YMCA of the USA.<sup>1</sup>

Dated this 29th day of March, 2011.

Defendants GROUPON, INC. and YMCA of the USA

By:           /s/ Sara Z. Moghadam            
Sara Z. Moghadam, No. 463862  
DLA Piper LLP (US)  
500 8th Street, N.W.

<sup>1</sup> YMCA was apparently sued incorrectly as it is a national organization which had no contractual relationship with Groupon. Based on the allegations of the complaint, it appears that the Plaintiff has confused YMCA of the USA with a local YMCA organization with which YMCA of the USA has no direct corporate relationship.

Washington, D.C. 20004  
Telephone: (202) 799-4000  
Facsimile: (202) 799-5000  
[sara.moghadam@dlapiper.com](mailto:sara.moghadam@dlapiper.com)

Shirli F. Weiss\*  
Christopher M. Young\*  
DLA Piper LLP (US)  
401 B Street, Suite 1700  
San Diego, CA 92101  
Telephone: (619) 699-2700  
Facsimile: (619) 699-2701  
[shirli.weiss@dlapiper.com](mailto:shirli.weiss@dlapiper.com)  
[christopher.young@dlapiper.com](mailto:christopher.young@dlapiper.com)

\*pro hac vice applications to be filed

**CERTIFICATE OF SERVICE**

I hereby certify that on the 29th day of March, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system that sent such filing to the following:

Charles J. LaDuca [charlesl@cuneolaw.com]  
CUNEO GILBERT & LADUCA, LLP  
507 C Street, NE  
Washington, DC 20002  
*Counsel for Plaintiff*

and served copies by first class mail, postage prepaid, to the following:

Rachel L. Jensen  
ROBBINS GELLER RUDMAN &  
DOWD LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
*Counsel for Anthony Ferreira and  
Sarah Gosling*

Charles E. Schaffer  
LEVIN FISHBEIN SEDRAN &  
BERMAN  
Suite 500  
510 Walnut Street  
Philadelphia, PA 19106  
*Counsel for Plaintiff*

Michael A. McShane  
AUDET & PARTNERS, LLP  
221 Main Street, Suite 1460  
San Francisco, CA 94105  
*Counsel for Plaintiff*

Christopher M. Ellis  
BOLEN ROBINSON & ELLIS  
2nd Floor  
202 South Franklin  
Decatur, IL 62523  
*Counsel for Plaintiff*

Clayton D. Halunen  
Shawn J. Wanta  
HALUNEN & ASSOCIATES  
1650 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402  
*Counsel for Plaintiff*

/s/ Sara Z. Moghadam

Sara Z. Moghadam