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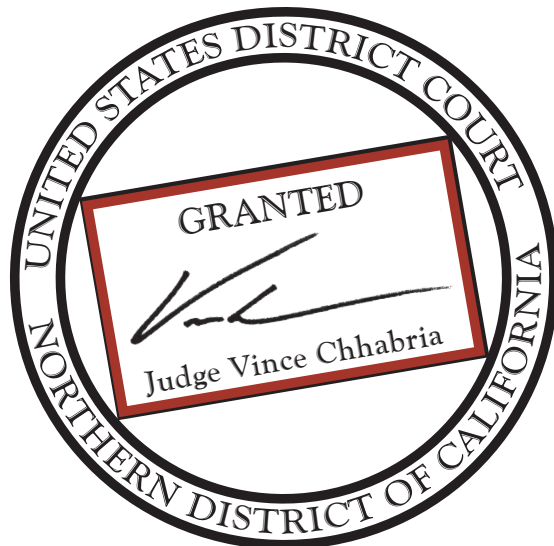
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Attorneys for Defendant AT&T Services, Inc.



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANTHONY URETA and MARILYN
DITO, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

AT&T SERVICES, INC.,

Defendant.

Case No. 15-cv-03653-VC

**STIPULATION OF THE PARTIES
CONCERNING AMENDMENT OF
COMPLAINT**

1 The parties, through their undersigned attorneys, hereby stipulate as follows:

2 1. The undersigned parties are counsel of record in the above captioned action that
3 has been filed by Plaintiff Anthony Ureta ("Ureta") against Defendant AT&T Services, Inc.
4 ("AT&T") asserting exempt misclassification of a proposed collective and a proposed class of
5 AT&T Training Specialists.

6 2. On October 29, 2015, Defendant filed a Motion to Strike Class Allegations
7 Pursuant to Rule 12(f) or, in the alternative, Rule 23(d)(1)(D).

8 3. Plaintiffs have agreed not to oppose Defendant's Motion, but instead to file a
9 Second Amended Complaint defining the proposed collective and class[es] to expressly exclude
10 any AT&T employees who were presented with and did not timely opt out of AT&T's
11 Management Arbitration Agreement ("MAA"). The filing of the Complaint will render AT&T's
12 motion to strike moot.

13 4. The limitation in the previous paragraph shall not apply as to Plaintiffs' PAGA
14 claims, which shall be asserted on behalf of California employees who worked for AT&T in
15 California during the relevant limitations period irrespective of whether those employees are
16 bound by the MAA.

17 5. AT&T has also agreed that the Second Amended Complaint will add Wendell
18 Walton as a proposed class representative, and will define separate subclasses for Training
19 Specialists employed as Designers and Deliverers.

20 6. AT&T reserves the right to file a responsive pleading of its choice to Plaintiffs'
21 Second Amended Complaint.

22 **SO STIPULATED.**

23 Dated: November 9, 2015

24 By: /s/ Jahan C. Sagafi
Jahan C. Sagafi

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Dated: November 9, 2015

By: /s/ Thomas R. Kaufman
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ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the other signatory above.

Dated: November 9, 2015

By: /s/ Jahan C. Sagafi
Jahan C. Sagafi