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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

ROBERT CULLEN,
*On Behalf of Himself and All Others Similarly
Situating,*
Plaintiff,
v.
ZOOM VIDEO COMMUNICATIONS, INC.,
Defendant.

Case No. 5:20-cv-02155-LHK-SVK

SAMUEL TAYLOR,
*On Behalf of Himself and All Others Similarly
Situating,*
Plaintiff,
v.
ZOOM VIDEO COMMUNICATIONS, INC.,
Defendant.

Case No. 3:20-cv-02170-RS

LISA T. JOHNSTON,
*On Behalf of Herself and All Others Similarly
Situating,*
Plaintiff,
v.
ZOOM VIDEO COMMUNICATIONS, INC.,
Defendant.

Case No. 5:20-cv-02376-SVK

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TESHA KONDRAT, GAVIN WOLFE, and
CHANELLE MURPHY,

*Individually and On Behalf of All Others
Similarly Situated,*

Plaintiffs,

v.

ZOOM VIDEO COMMUNICATIONS, INC.,

Defendants.

Case No. 5:20-cv-02520-NC

ROBERT LAWTON,

*On Behalf of Himself and All Others Similarly
Situated,*

Plaintiff,

v.

ZOOM VIDEO COMMUNICATIONS, INC.,

Defendant.

Case No. 3:20-cv-02592-SK

THERESE JIMENEZ,

*On Behalf of Herself, Her Minor Child M.F.,
and All Others Similarly Situated,*

Plaintiff,

v.

ZOOM VIDEO COMMUNICATIONS, INC.,

Defendant.

Case No. 5:20-cv-02591-LHK

1 KRISTEN HARTMANN,

2 *On Behalf of Herself and All Others Similarly*
3 *Situated,*

4 Plaintiff,

5 v.

6 ZOOM VIDEO COMMUNICATIONS, INC.,

7 Defendant.

Case No. 5:20-cv-02620-NC

8 LISHOMWA HENRY,

9 *Individually and All Others Similarly Situated,*

10 Plaintiff,

11 v.

12 ZOOM VIDEO COMMUNICATIONS, INC.,

13 Defendant.

Case No. 5:20-cv-02691-SVK

14 **STIPULATION**

15 The parties in the eight above-referenced cases, by and through their counsel of record, hereby
16 stipulate as follows:

17 1. WHEREAS, Plaintiff in the action entitled *Cullen v. Zoom Video Communications,*
18 *Inc.*, Case No. 5:20-cv-02155-LHK-SVK (“*Cullen*”) filed his Complaint on March 30, 2020;

19 2. WHEREAS, Plaintiff in the action entitled *Taylor v. Zoom Video Communications,*
20 *Inc.*, Case No. 3:20-cv-02170-RS (“*Taylor*”) filed his Complaint on March 31, 2020;

21 3. WHEREAS, Plaintiff in the action entitled *Johnston v. Zoom Video Communications,*
22 *Inc.*, Case No. 5:20-cv-02376-SVK (“*Johnston*”) filed his Complaint on April 8, 2020;

23 4. WHEREAS, Plaintiff in the action entitled *Kondrat, et al. v. Zoom Video*
24 *Communications, Inc.*, Case No 5:20-cv-02520-NC (“*Kondrat*”) filed her Complaint on April 13,
25 2020;

1 5. WHEREAS, Plaintiff in the action entitled *Lawton v. Zoom Video Communications,*
2 *Inc.*, Case No. 3:20-cv-02592-SK (“*Lawton*”) filed his Complaint on April 14, 2020;

3 6. WHEREAS, Plaintiff in the action entitled *Jimenez v. Zoom Video Communications,*
4 *Inc.*, Case No. 5:20-cv-02591-LHK (“*Jimenez*”) filed his Complaint on April 14, 2020;

5 7. WHEREAS, Plaintiff in the action entitled *Hartmann v. Zoom Video Communications,*
6 *Inc.*, Case No. 5:20-cv-02620-NC (“*Hartmann*”) filed her Complaint on April 15, 2020;

7 8. WHEREAS, Plaintiff in the action entitled *Henry v. Zoom Video Communications,*
8 *Inc.*, Case No. Case No. 5:20-cv-02691-SVK (“*Henry*”) filed his Complaint on April 17, 2020;

9 9. WHEREAS, on April 8, 2020, Plaintiff in the *Cullen* action filed a Notice of Related
10 Case and Administrative Motion requesting the Court to determine that the *Taylor* action was related
11 to the *Cullen* action under Local Rule 3-12(a).

12 10. WHEREAS, on April 23, 2020, Plaintiff in the *Cullen* action filed an Amended Notice
13 of Related Cases and Administrative Motion to Consider Whether Cases Should Be Related; Notice
14 of Pendency of Other Actions, requesting the Court to determine that the *Taylor, Johnston, Kondrat,*
15 *Lawton, Jimenez, Hartman,* and *Henry* actions are related to the *Cullen* action under Local Rule 3-
16 12(a);

17 11. WHEREAS, the parties have now agreed that the eight actions should be deemed
18 “related” pursuant to Local Rule 3-12(a), and transferred to this Court, as set forth in the Amended
19 Administrative Motion because (a) the eight actions concern substantially the same defendant,
20 property, transactions or events; and (b) it appears likely that there will be an unduly burdensome
21 duplication of labor and expense or conflicting results if the cases are conducted before different
22 Judges;

23 12. WHEREAS, the parties agree that once the *Taylor, Johnston, Kondrat, Lawton,*
24 *Jimenez, Hartman,* and *Henry* actions are deemed related to the *Cullen* action, they should all be
25 transferred and reassigned (if not already assigned) to the Honorable Lucy H. Koh for all purposes;

1 NOW, THEREFORE, the parties in the *Cullen, Taylor, Johnston, Kondrat, Lawton, Jimenez,*
2 *Hartman,* and *Henry* actions request that the Court order as follows:

3 A. That the *Taylor, Johnston, Kondrat, Lawton, Jimenez, Hartman,* and *Henry* actions be
4 deemed related to the *Cullen* Action, because:

- 5 a. the actions concern substantially the same parties, property, transaction or event;
6 and
7 b. it appears likely that there will be an unduly burdensome duplication of labor and
8 expense or conflicting results if the cases are conducted before different Judges.

9 B. That the *Taylor, Johnston, Kondrat, Lawton, Hartman,* and *Henry* actions be transferred
10 and reassigned to the Honorable Lucy H. Koh for all purposes.

11 **IT IS SO STIPULATED**

12 Dated: April 23, 2020

Respectfully submitted,

13
14 /s/ Mark J. Tamblyn

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Attorneys for Plaintiff Henry and the Proposed Class

**pro hac vice applications forthcoming*

/s/ Michael G. Rhodes

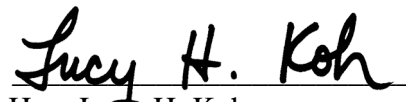
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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

Date: April 24, 2020


Hon. Lucy H. Koh
United States District Judge