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9	Counsel for Defendants United A United Airlines Holdings, Inc.	irlines, Inc. and	d			
10						
11	UNITED STATES DISTRICT COURT					
12	NORTHERN DISTRICT OF CALIFORNIA					
13	SAN FRANCISCO DIVISION					
14						
15 16	KEVIN E. BYBEE, an individual SCHOLZ, an individual, and SAI individual,		Case No. 3:18	-cv-06632-JD		
17	on behalf of themselves and all persons similarly situated, Plaintiffs,		UNITED DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION FOR LEAVE TO ADD NEW PARTIES AND ONE CLAIM			
18						
19						
20	V.					
21	INTERNATIONAL BROTHERHOOD OF TEAMSTERS, a labor organization; JAMES HOFFA, in his official capacity as INTERNATIONAL BROTHERHOOD OF TEAMSTERS President and Representative; PETER FINN, in his official capacity as TEAMSTERS SEO LOCAL \$56/086 Bringing]					
22						
23			Judge:	Hon. James Donato		
24	TEAMSTERS SFO LOCAL 856/986 Principal Officer; UNITED AIRLINES, INC., a Delaware corporation; and UNITED	IC., a	Hearing Date: September 3, 2020 Hearing Time: 10:00 a.m. Courtroom: 11	: September 3, 2020		
25	AIRLINES HOLDINGS, INC., a Corporation;					
26	Defendant:	s.				
27			-			
28			T 12 1 1 1 1			
				ED'S RESPONSE TO PLAINTIFFS' DTION FOR LEAVE TO ADD NEW PARTIES AND ONE CLAIM Case No. 3:18-cv-06632-JD		

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1	On July 20, 2020, Plaintiffs filed a motion for leave to add new parties and one claim.					
2	(ECF No. 78). While Defendants United Airlines, Inc. and United Airlines Holdings, Inc. (the					
3	"United Defendants") disagree with the rhetoric and characterizations in Plaintiffs' motion, the					
4	United Defendants do not oppose the relief requested via the motion. In the event the Court					
5	grants Plaintiffs' motion, the United Defendants will respond on the merits through Rule 12					
6	motion practice after Plaintiffs have serve their amended complaint.					
7						
8	Dated: August 3, 2020. Respectfully submitted,					
9	CHRIS A. HOLLINGER ROBERT A. SIEGEL					
10	O'Melveny & Myers LLP					
11	By: <u>/s/ Chris A. Hollinger</u> CHRIS A. HOLLINGER					
12	Counsel for Defendants United Airlines, Inc.					
13	and United Continental Holdings, Inc.					
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28	- 1 - UNITED'S RESPONSE TO PLAINTIFFS' MOTION FOR LEAVE TO ADD NEW PARTIES AND ONE CLAIM					
	CASE NO. 3:18-CV-06632-JD					

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1	CERTIFICATE OF SERVICE				
2	I hereby certify that a true and correct copy of the foregoing was caused to be served via				
3	ECF on this 3rd day of August, 2020 on the following:				
4	JANE CATHERINE MARIANI Law Office of Jane C. Mariani				
5	584 Castro Street,				
6	Box 687 San Francisco, CA 94114				
7	Telephone: (415) 203-2453 E-mail: mariani.advocacy@gmail.com				
8	Attorney for Plaintiffs				
9	SUSAN K. GAREA Beeson, Tayer & Bodine, APC				
10	483 Ninth Street, 2nd Floor Oakland, California 94607				
11	Tel: (510) 625-9700 E-Mail: sgarea@beesontayer.com				
12	Attorney for Union Defendants				
13	Dated: August 3, 2020.	O'MELVENY & MYERS LLP			
14		By: <u>/s/ Chris A. Hollinger</u> CHRIS A. HOLLINGER			
15		Counsel for Defendants United Airlines, Inc. and United Airlines Holdings, Inc.			
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28		UNITED'S RESPONSE TO PLAINTIFFS'			
	- 2	MOTION FOR LEAVE TO ADD NEW			