

DOGALI LAW GROUP, P.A.

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**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA**

A.L., by and through D.L., et al.,)
)
Plaintiffs,)
)
v.)
)
WALT DISNEY PARKS AND RESORTS)
U.S., INC.,)
)
Defendant.)

) Case No.: 14-cv-3327
)
) **NOTICE OF MOTION AND**
) **MOTION FOR LEAVE TO FILE**
) **AMENDMENT TO COMPLAINT**
)
) **Hearing Date: Oct. 6, 2014**
) **Time: 10:00 a.m.**
) **Place: Courtroom 8, 312 N.**
) **Spring Street, Los Angeles, CA**

Hon. Manuel L. Real

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**NOTICE OF MOTION AND MOTION FOR
LEAVE TO FILE AMENDMENT TO COMPLAINT**

PLEASE TAKE NOTICE THAT ON October 6, 2014 at 10:00 a.m. or on such other date as the Court may provide, at 312 N. Spring Street, Los Angeles, CA, Courtroom 8, before the Honorable Manuel L. Real, Plaintiffs will present for hearing their Motion for Leave to File Amendment to Complaint.

As more fully explained in the accompanying memorandum of law, amending the Complaint in this case is appropriate because the case is in its infancy, no delay to Defendant exists, no delay exists, no bad faith or dilatory motive exists, and Plaintiffs have not previously amended any pleadings in this action.

This motion is based upon the Complaint filed in this case, the memorandum of law and its accompanying exhibit, and any other evidence or argument as may be considered by the Court. A proposed order is also filed herewith.

Statement of Local Rule 7-3 Compliance

At the early meeting of counsel which occurred in person on August 8, 2014, the undersigned advised Disney of the intention to file suit on behalf of the additional plaintiffs. An estimate of the number of new plaintiffs was provided. Disney expressed no position at that time. On Tuesday, August 19, 2014, the undersigned advised Disney that the new suit for the additional plaintiffs would take the form of an amendment to the instant action. On Thursday, August 21, Disney advised that such motion would be opposed. Disney's opposition was reaffirmed on Friday, August 22, when the parties' Joint Report of Early Meeting of Counsel was finalized and filed (Doc. 48).

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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true copy of the foregoing Proof of Service has been electronically filed with the Clerk of the Court pursuant to Local Rule 5-4.1 and General Order No. 10-07 regarding Electronic Case Filing in the U.S. District Court, Central District of California by using the CM/ECF system which will send a copy of the documents to counsel of record pursuant to Local Rule 5-3.2.1 to:

Rhonda Trotter, Esq.
Kaye Scholer LLP
1999 Avenue of the Stars, Suite 1700
Los Angeles, California 90067
rtrotter@kayescholer.com

this 27th day of August, 2014.

/s/ Andy Dogali
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