UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ANIBAL MEJIAS, DENNIS MINTER, JERRY FULLER, and JOSE PENA, on behalf of themselves and those similarly situated, Plaintiffs, v. GOYA FOODS, INC., ROBERT I. UNANUE, FRANCISCO R. UNANUE, JOSEPH PEREZ, PETER UNANUE, DAVID KINKELA, REBECCA RODRIGUEZ, CARLOS G. ORTIZ, MIGUEL A LUGO, JR., CONRAD COLON, JOHN DOES 1 - 10 (said names being fictitious, real names unknown), ABC COMPANIES 1 - 10 (said names being fictitious, real names unknown), Defendants.	No. 3:20-cv-12365-BRM-TJB

DEFENDANTS' NON-OPPOSITION TO PLAINTIFFS' MOTION TO AMEND THE COMPLAINT

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Defendants do not agree with the factual and jurisdictional allegations in Plaintiffs' proposed second amended complaint ("PSAC"). Nor do Defendants believe that any of the causes of action in the PSAC have merit. Indeed, Defendants have concurrently filed an opposition to Plaintiffs' motion to remand and intend to move to dismiss several of the claims in the PSAC. Nonetheless, Defendants have elected to not oppose Plaintiffs' request to file the PSAC. In doing so, Defendants expressly reserve their rights to challenge the allegations and claims in the PSAC.

Dated: November 23, 2020
Morristown, New Jersey

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

/s/ Ryan T. Warden

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