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Attorney for Plaintiff: TINA MA individually and as successor in
interest of JOSEPH MA

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

TINA MA individually and as successor)	Civ. No. 1:15-01426 WBS MJS
in interest of JOSEPH MA,)	
)	STIPULATION AND ORDER GRANTING
)	PLAINTIFF LEAVE TO FILE SECOND
Plaintiff,)	AMENDED COMPLAINT
)	
vs.)	
)	
CITY OF FRESNO; CHIEF OF POLICE JERRY)	
DYER, in his individual and official)	
capacities; and DOES 1-50 inclusive,)	
)	Judge: Honorable William B. Shubb
Defendants.)	
)	
)	

IT IS HEREBY STIPULATED by and between Plaintiff, TINA MA individually
and as successor in interest of JOSEPH MA, (hereinafter "Plaintiff"), and
Defendants CITY OF FRESNO and CHIEF OF POLICE JERRY DYER, (hereinafter
"Defendants,") by and through their respective attorneys of record, that
Plaintiff may file a Second Amended Complaint within 10 days of the execution
of this Order by the Court.

WHEREAS, Plaintiff filed a First Amended Complaint in this action on
September 23, 2015;

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1 WHEREAS, the parties knew by virtue of the joint status report filed
2 February 29, 2016, the parties discussed and contemplated that Plaintiff
3 would be filing a Second Amended Complaint to substitute in natural persons
4 for DOE defendants when their true identifies were ascertained;

5 WHEREAS, Plaintiff contends that she has discovered the true identity
6 of DOE NUMBER ONE (1) based upon Defendant City of Fresno's Initial
7 Disclosures and seeks to substitute COLIN LEWIS into the action in place and
8 stead of DOE NUMBER ONE (1).

9 WHEREAS, Plaintiff's filing of a Second Amended Complaint in the form
10 of the Second Amended Complaint attached hereto as Exhibit A will not delay
11 compliance with any of the case management deadlines already ordered by the
12 Court;

13 WHEREAS, Defendants shall have twenty-one (21) days to respond to
14 Plaintiff's Second Amended Complaint from the date of service;

15 **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between the parties
16 hereto through their respective attorneys of records that Plaintiff may,
17 pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, file a Second
18 Amended complaint in the form of the Second Amended Complaint attached hereto
19 as Exhibit A.

20 **IT IS FURTHER STIPULATED** that Plaintiff will file her Second Amended
21 Complaint within ten (10) calendar days of the Court's Order permitting such
22 filing, and that Defendant's response thereto shall be filed within twenty-
23 one (21) days after the Second Amended Complaint is filed and served.

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LAW OFFICE OF STANLEY S. MA

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FERGUSON PRAET AND SHERMAN

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