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9 Attorneys for Defendant Philip Hyden, M.D.

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

12 CYNTHIA RIVERA-MARTINEZ and)
13 ARTURO MARTINEZ,)

14 Plaintiffs,)

15 vs.)

16 KERN COUNTY; KERN COUNTY)
17 DEPARTMENT OF HUMAN RESOURCES;)
18 SOCIAL WORKER STEPHANIE MEEK,)
19 individually; PHILIP HYDEN, M.D.,)
20 individually; and DOES 1 through 100,)
21 inclusive,)

22 Defendants.)

23 Case No. 1:16-CV-00062---JLT)

24 **WRITTEN CONSENT OF PLAINTIFFS)
25 CYNTHIA RIVERA-MARTINEZ AND)
26 ARTURO MARTINEZ AND CO-)
27 DEFENDANTS KERN COUNTY, KERN)
28 COUNTY DEPARTMENT OF HUMAN)
RESOURCES AND SOCIAL WORKER)
STEPHANIE MEEK TO THE FILING OF)
(PROPOSED) FIRST AMENDED)
ANSWER TO PLAINTIFFS' FIRST)
AMENDED COMPLAINT AND COURT)
ORDER THEREON)**

(Doc. 22)

25 Pursuant to Federal Rules of Civil Procedure, Rule 15 (2) which allows for amendment of
26 a party's pleadings before trial with the other parties' written consent and for the sake of
27 preserving precious judicial resources that would be consumed if a motion for leave to amend
28 were made, Defendant, PHILIP HYDEN ("Dr. Hyden"), respectfully submits this stipulation in

1 which Plaintiffs CYNTHIA RIVERA-MARTINEZ and ARTURO MARTINEZ and Co-
2 Defendants KERN COUNTY, KERN COUNTY DEPARTMENT OF HUMAN RESOURCES
3 and SOCIAL WORKER STEPHANIE MEEK, by and through their respective counsel of
4 record, hereby consent in writing to the filing of Dr. Hyden's (Proposed) First Amended Answer
5 to Plaintiff's First Amended Complaint, a true and correct copy of which is attached hereto as
6 Exhibit "A."

7 Dated: August 18, 2016

LACK LAW GROUP, APC

8
9 By: /s/ *Rebecca D. Lack* (electronic signature
use authorized on August 17, 2016)

10 Rebecca D. Lack
11 Attorneys for Plaintiffs
12 Cynthia Rivera-Martinez and
Arturo Martinez

13 Dated: August 18, 2016

COUNTY OF KERN, COUNTY COUNSEL

14
15 By: /s/ *Kathleen Rivera* (electronic signature
use authorized on August 17, 2016)

16 Theresa A. Goldner, County Counsel
17 By: Kathleen Rivera, Deputy
18 Attorneys for Defendants
19 Kern County, Kern County Department of
Human Services and Social Worker
Stephanie Meek

20 Dr. Hyden requests that this court issue the order below based on the above
21 written consents of the respective counsel for Plaintiffs and Co-Defendants. Attached hereto as
22 Exhibit B are true and correct copies of emails in which attorneys, Rebecca Lack and Kathleen
23 Rivera, have authorized the use of their electronic signatures on this written consent

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3 Dated: August 19, 2016

4 WEISS MARTIN SALINAS & HEARST
5 A Professional Corporation

6 By: /s/ Carol A. O'Neil
7 Andrew R. Weiss
8 Carol A. O'Neil
9 Attorneys for Defendant
10 Philip Hyden, M.D.

11 **ORDER**

12 Based on the stipulation of the parties, the Court **ORDERS** that defendant, Dr. Hyden,
13 may file his first amended answer within five days.

14 IT IS SO ORDERED.

15 Dated: August 19, 2016

16 /s/ Jennifer L. Thurston
17 UNITED STATES MAGISTRATE JUDGE