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Attorneys for Plaintiff,
JENNIFER LARA

THE UNITED STATES DISTRICT COURT
THE EASTERN DISTRICT OF CALIFORNIA

JENNIFER LARA,

Plaintiff,

vs.

SUTTER DAVIS HOSPITAL, SALUD
CLINIC, SUTTER WEST WOMEN'S
HEALTH, SUSAN MAAYAH, M.D.,
AMELIA BAUERMANN, C.N.M., and
DOES 1 to 100, inclusive,

Defendants.

SUTTER DAVIS HOSPITAL,

Cross-Complainant,

vs.

UNITED STATES OF AMERICA, and
ROES 1 - 10.

Cross-Defendants.

CASE NO: 2:12-CV-02407-WBS-CKD

**PETITION AND ORDER FOR
APPOINTMENT OF GUARDIAN AD
LITEM**

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1 The Petitioner minor, E.R., by and through his mother, Plaintiff, JENNIFER
2 LARA, seeks the appointment of Carolyn Young as guardian ad litem for E.R., who is a
3 minor born on February 3, 2010.

4 1. The guardian ad litem is to represent the interests of minor, E.R., who
5 resides at (address redacted).

6 2. Carolyn Young is a professional fiduciary whom I request to be the
7 guardian ad litem of E.R., a minor.

8 3. The Court should appoint a guardian ad litem because minor, E.R., has a
9 cause of action on which suit should be brought for medical negligence resulting from
10 Defendants' medical care of Plaintiff, JENNIFER LARA, and minor Petitioner, E.R..

11 4. Minor Petitioner, E.R., has no general guardian nor has a previous petition
12 for appointment of a guardian ad litem been filed in this matter.

13 5. Carolyn Young of Carolyn Young Fiduciary Services, whose address is
14 3031 F Street, Suite 203, Sacramento, California 95816, is a competent and
15 responsible person, and fully competent to act as E.R.'s guardian ad litem.

16 6. The proposed guardian ad litem has no interests adverse to the interests
17 of minor Petitioner, E.R..

18 7. Said person is willing to act as guardian ad litem for minor Petitioner, E.R.,
19 as appears by her consent attached hereto.

20 WHEREFORE, minor Petitioner, E.R., by and through his mother, Plaintiff,
21 JENNIFER LARA, moves the Court for an order appointing Carolyn Young as guardian
22 ad litem of minor Petitioner, E.R., for the purpose of bringing action

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1 against Sutter Davis Hospital, Sutter West Women's Health and Susan Maayah, M.D.
2 on the claim herein above stated, and on any related cross and counter claims.

3 I declare under penalty of perjury under the laws of the State of California that
4 the foregoing is true and correct.

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6 DATED: December 9, 2013

RICE & BLOOMFIELD, LLP

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9 /s/ Linda Fermoyle Rice

LINDA FERMOYLE RICE, ESQ.
Attorneys for Petitioner, E.R., a minor,
10 by and through his Guardian Ad Litem,
11 Carolyn Young

12 DATED: December 9, 2013

13
14 /s/ Jennifer Lara

Petitioner, by and through his mother,
15 Plaintiff, JENNIFER LARA

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17 **CONSENT OF NOMINEE**

18 I, Carolyn Young, the nominee of the minor Petitioner, consent to act as guardian
19 ad litem for the minor Petitioner, E.R., in the above action.

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21 DATED: December 9, 2013

/s/ Carolyn Young

Carolyn Young, Professional Fudiciary

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ORDER

The petition for an order appointing Carolyn Young as guardian ad litem for minor
Petitioner, E.R., is GRANTED.

IT IS SO ORDERED.

Dated: December 18, 2013



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE BY MAIL

The undersigned hereby certifies that she is employed by Rice & Bloomfield, LLP, and is a person of such age and discretion to be competent to serve papers.

On December 10, 2013, she served a copy of the following documents:

PETITION AND ORDER FOR APPOINTMENT OF GUARDIAN OF LITEM

by placing said copy in a postage paid envelope addressed to the persons hereinafter names, at the places and addresses set forth below, which are the last known addresses, and by depositing said envelope and its contents in the United States Mail at Encino, California.

Addressees:

Larry Thornton, Esq. La Follette, Johnson, De Haas, Fesler & Ames 655 University Avenue, Suite 119 Sacramento, California 95825 (916) 563-3100 / (916) 565-3704 Fax	Attorneys for Defendant, Sutter Davis Hospital
Louis H. De Haas, Esq. La Follette, Johnson, De Haas, Fesler & Ames 865 South Figueroa Street, Suite 3200 Los Angeles, California 90017-3200 (213) 426-3600 / (213) 426-3650 Fax	Attorneys for Defendant, Sutter Davis Hospital
Bob Zimmerman, Esq. Schuering, Zimmerman & Doyle 400 University Avenue Sacramento, California 95825 (916) 567-0400 / (916) 568-0400 Fax	Attorneys for Defendants, Susan Maayah, M.D. and Sutter West Women's Health
Edward Olsen, Esq. Assistant U.S. Attorney Robert T. Matsui U.S. Courthouse 501 I Street, Suite 10-100 Sacramento, California 95814 (916) 554-2775 / (916) 554-2900 Fax	Attorneys for Cross-Defendant United States of America

/s/ JoAnn Trujillo
JoANN TRUJILLO