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5 *Attorneys for Relators*

6 UNITED STATES DISTRICT COURT
7 EASTERN DISTRICT OF CALIFORNIA

8 United States of America, State of California
9 and Nevada, Placer and Sierra Counties, *ex rel.*
Vicki L. Miller, Jennifer Bente, Priscilla
10 Frazier, Linda Garcia, Mary M. Graham,
Bonnie Hampton, and Tamara Nichols,

11 Plaintiffs and Relators,

12 vs.

13 Community Recovery Resources Inc., a
14 California Corporation, Sierra Council on
Alcoholism and Drug Dependence, a Merged
15 California Corporation, Ron Abram, Jeremy
Ashurst, Pauline Bowman, Doug Carver, Kevin
16 M. Cassidy, Aaron J. Cleveland, M.D., Chuck
Coovert, Warren A. Daniels, Sommer Dobbins,
17 Christine Findley, Christina Frye, Toni
Gehrman, Jeffery Jones, Jonel Landry, Keith
18 Litke, Debora Martin, Traci J. Peters, Elaine
Seidel, Randall Tryon, and Traci Witt,

19 Defendants.
20

Case No.: 2:13-cv-1004 TLN AC

AMENDED STIPULATION AND ORDER
ALLOWING RELATORS TO FILE SECOND
AMENDED COMPLAINT

21
22 **WHEREAS** Relators VICKI L. MILLER, JENNIFER BENTE, PRISCILLA FRAZIER,
23 LINDA GARCIA, MARY M. GRAHAM, BONNIE HAMPTON, AND TAMARA NICHOLS
24 (hereafter "Relators") filed a Complaint in the instant action on May 21, 2013 and filed their
25 First Amended Complaint on October 2, 2015.

26 **WHEREAS** Relators seek to file their Second Amended Complaint. The Second
27 Amended Complaint makes changes to non-substantive errors contained in the First Amended
28 Complaint that resulted from the dictation software used. Additionally, the Second Amended

AMENDED STIPULATION AND ORDER ALLOWING RELATORS TO FILE SECOND AMENDED
COMPLAINT - 1

1 Complaint omits common law claims contained in Count IV (Payment Under Mistake of Fact),
2 Count V (Negligence), and Count VI (Unjust Enrichment) of the First Amended Complaint,
3 without prejudice to the United States of America and the State of California's ability to pursue
4 those claim at a later time. The defendants would, however, oppose any motion by any
5 governmental entity to pursue any of these common law claims in this litigation.

6 **IT IS HEREBY STIPULATED**, by and between Relators and Defendants Community
7 Recovery Resources Inc., a California Corporation, Sierra Council on Alcoholism and Drug
8 Dependence, a Merged California Corporation, Ron Abram, Pauline Bowman, Kevin M. Cassidy,
9 Aaron J. Cleveland, M.D., Chuck Coovert, Warren A. Daniels, Christine Findley, Christina Frye,
10 Jeffery Jones, Jonel Landry, Keith Litke, Debora Martin, Elaine Seidel, Randall Tryon, and Traci
11 Witt, by and through their respective counsel, to filing of Relators' Second Amended Complaint
12 within 14 days of the signed order.

13 Dates: October 29, 2015

Respectfully submitted,

14 /s/ Gary B. Callahan

15 Tatiana Filippova, Esq.
16 Gary B. Callahan, Esq.
Attorneys for Relators

17 /s/ Ronald E. Enabnit

18 Ronald E. Enabnit, Esq.
19 Attorney for Defendants

20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21
22 Dated: November 3, 2015

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25 Troy L. Nunley
26 United States District Judge
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