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14 ATTORNEYS FOR PLAINTIFFS AND  
15 THE CLASS THEY SEEK TO REPRESENT

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16 UNITED STATES DISTRICT COURT  
17 FOR THE EASTERN DISTRICT OF CALIFORNIA

18 KOUROSH KENNETH HAMIDI, *et al.*, AND  
19 THE CLASS THEY SEEK TO REPRESENT

20 Plaintiffs,

21 v.

22 SERVICE EMPLOYEES INTERNATIONAL  
23 UNION LOCAL 1000, AND JOHN CHIANG,  
24 Controller, State of California;

25 Defendants.

CASE NO.  
2:14-CV-319-WBS-KJN

**CLASS ACTION**

**STIPULATION FOR LEAVE TO FILE  
PLAINTIFFS' CORRECTED  
CONSOLIDATED RESPONSE/  
OPPOSITION TO DEFENDANTS'  
CROSS-MOTIONS FOR SUMMARY  
JUDGMENT (DOCKET NOS. 68 &  
75); REPLY TO DEFENDANTS'  
OPPOSITIONS TO PLAINTIFFS'  
MOTION FOR SUMMARY  
JUDGMENT**

26 TO THE COURT:

27 The parties to the above-captioned case hereby submit the following stipulation for leave to file a  
28 Corrected Consolidated Response/Opposition to Defendants' Cross-Motions for Summary Judgment  
(Docket Nos. 68 & 75); Reply to Defendants' Oppositions to Plaintiffs' Motion for Summary Judgment,  
filed on Friday, 16 December 2016 (Docket No. 82), set for hearing on Monday, 6 February 2017, as  
follows:

WHEREAS, counsel for Defendant Service Employees International Union, Local 1000, has

brought to the attention an inadvertent error in Plaintiffs' reference to *Agostini v. Felton*, 521 U.S. 203, 237 (1997), appearing at Docket No. 82 at 17:22-24; ECF page 17 of 22, lines 22-24 of Plaintiffs' Brief, which appears to misstate the holding of that case; and

WHEREAS, it is plain from the context that this misstatement was inadvertent and unintended; and

WHEREAS, it is in the interests of justice and judicial economy that no confusion arise from this inadvertent error;

THEREFORE, the parties hereby stipulate and agree as follows:

1. Plaintiffs should be permitted to file the attached Corrected Consolidated Response/Opposition, which corrects this error as well as other, non-substantive editing errors; and
2. That the Clerk be directed to accept and file the attached Corrected Consolidated Response/Opposition, in substitute for Docket No. 82.

DATED: 21 December 2016

Respectfully submitted,

/s/ Steven R. Burlingham

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ATTORNEYS FOR DEFENDANT SEIU  
LOCAL 1000

ORDER

IT IS SO ORDERED.

Dated: December 21, 2016



WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I, W. James Young, counsel for Plaintiffs, hereby certify that I electronically filed with the Clerk of Court the foregoing **STIPULATION FOR LEAVE TO FILE PLAINTIFFS' CORRECTED CONSOLIDATED RESPONSE/ OPPOSITION TO DEFENDANTS' CROSS-MOTIONS FOR SUMMARY JUDGMENT (DOCKET NOS. 68 & 75); REPLY TO DEFENDANTS' OPPOSITIONS TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**, using the CM/ECF system which will send notification of such filing to Defendants' counsel, this 21st day of December, 2016.

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/s/ W. James Young

W. JAMES YOUNG

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