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 dba Saint Francis Memorial Hospital

10 CRYSTAL A. POOLE,
 11 Plaintiff,
 12 v.
 13 CATHOLIC HEALTHCARE WEST/ST.
 14 FRANCIS MEMORIAL HOSPITAL, and
 DOES 1-50, et al,
 15 Defendants.

Case No. CV 10-4637 JCS

**STIPULATION AND [PROPOSED]
 ORDER ALLOWING PLAINTIFF LEAVE
 TO AMEND COMPLAINT**

17 IT IS HEREBY STIPULATED by and between the parties to this action, directly and through
 18 their attorneys of record herein, that:

- 19 1. This employment discrimination/retaliation case was filed on October 14, 2010.
- 20 2. The Summons and Complaint were served on Defendant Catholic Healthcare West on
 21 October 26, 2010;
- 22 3. Defendant's counsel notified Plaintiff that Defendant planned to file a Motion to Dismiss, a
 23 Motion for More Definite Statement and a Motion to Strike Immaterial and Redundant Matter;
- 24 4. Pursuant to a prior Stipulation or Order, Defendant's responsive pleading was due to be filed
 25 on November 30, 2010.
- 26 5. Defendant offered plaintiff time to amend her Complaint to number the paragraphs in the
 27 Complaint and delete unnecessary and irrelevant allegations and citations to statutes and case law.
- 28 6. Plaintiff has agreed to file a First Amended Complaint;

1 7. The parties would like to avoid the time and expense related to the motions.

2 8. Plaintiff and Defendant stipulate that Plaintiff shall have 30 days leave, to and including
3 December 30, 2010, within which to file a First Amended Complaint.

4 Dated: November 22, 2010

Crystal A. Poole, In Pro Se
Crystal A. Poole, In Pro Se

7 Dated: November 22, 2010

LAW OFFICES OF KATHERINE S. CLARK

Katherine S. Clark
Katherine S. Clark
Attorneys for Defendant Catholic Healthcare
West

11
12 **[PROPOSED ORDER]**

13 GOOD CAUSE APPEARING THEREFOR,

14 IT IS SO ORDERED.

15 Dated: November 24, 2010

