

E-Filed 11/21/11

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8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

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12 THRESSA WALKER, GEETA SINGH,
 13 M.D., AND KAI IHNKEN, M.D.,

14 Plaintiffs,

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v.

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17 COUNTY OF SANTA CLARA, SANTA
 18 CLARA VALLEY MEDICAL CENTER,
 HOLLISTER BREWSTER, M.D.,
 ALFONSO BANUELOS, M.D., DOLLY
 GOEL, M.D., AND DOES 1 through 50,
 inclusive,

19 Defendants.

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No. 10-CV-04668 RS

**STIPULATION TO FILE FOURTH
 AMENDED COMPLAINT AND
~~PROPOSED ORDER~~
 AS MODIFIED BY THE COURT**

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IT IS HEREBY STIPULATED AND AGREED by the parties, through their respective attorneys of record, that the Court may grant Plaintiffs leave to file a Fourth Amended Complaint to incorporate new allegations respecting events that took place after Plaintiffs filed their Third Amended Complaint.


Plaintiffs contend that good cause exists for this further amended pleading incorporating new allegations that arise out of a common nucleus of operative facts as in Plaintiffs' original and amended complaints. A copy of Plaintiff's proposed Fourth Amended Complaint is attached as Stipulation to File Fourth Amended Complaint

10-CV-04668 RS

~~[PROPOSED]~~ ORDER

1 IT IS HEREBY ORDERED that Plaintiffs may file a Fourth Amended Complaint in the
2 by December 12, 2011.
3 form attached hereto as Exhibit A. Defendants shall have 30 days from the filing of the Fourth
4 Amended Complaint to respond to it, and such response(s) need only address those new
5 allegations as identified in Paragraphs 120.1 to 120.55 and 285 to 290.

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7 Dated: 11/21/11


HONORABLE RICHARD SEEBORG
United States District Court Judge