E-Filed 11/21/11

CHARLES A. BONNER, ESQ. SB# 85413 1 A. CABRAL BONNER, ESQ. SB# 247528 2 LAW OFFICES OF BONNER & BONNER 475 GATE FIVE RD. SUITE 212 3 SAUSALITO, CA 94965 TEL: (415) 331-3070 FAX: (415) 331-2738 4 Cbonner799@aol.com 5 cabral@bonnerlaw.com ATTORNEYS FOR PLAINTIFFS 6 7 UNITED STATES DISTRICT COURT 8 NORTHERN DISTRICT OF CALIFORNIA 9 SAN JOSE DIVISION 10 11 12 THRESSA WALKER, GEETA SINGH, No. 10-CV-04668 RS M.D., AND KAI IHNKEN, M.D., 13 STIPULATION TO FILE FOURTH Plaintiffs, AMENDED COMPLAINT AND 14 (PROPOSED ORDER) v. AS MODIFIED BY THE COURT 15 COUNTY OF SANTA CLARA, SANTA 16 CLARA VALLEY MEDICAL CENTER, HOLLISTER BREWSTER, M.D., 17 ALFONSO BANUELOS, M.D., DOLLY GOEL, M.D., AND DOES 1 through 50, 18 inclusive, 19 Defendants. 20 21 IT IS HEREBY STIPULATED AND AGREED by the parties, through their respective 22 attorneys of record, that the Court may grant Plaintiffs leave to file a Fourth Amended Complaint 23 to incorporate new allegations respecting events that took place after Plaintiffs filed their Third 24 Amended Complaint. 25 Plaintiffs contend that good cause exists for this further amended pleading incorporating 26 new allegations that arise out of a common nucleus of operative facts as in Plaintiffs' original and 27 amended complaints. A copy of Plaintiff's proposed Fourth Amended Complaint is attached as 28 Stipulation to File Fourth Amended Complaint 10-CV-04668 RS

1	Exhibit A, and the new allegations are italicized and set forth in Paragraphs 120.1 through 120.55,		
2	and 285 through 290.		
3	It is further stipulated that Defendants	s shall h	ave 30 days from the filing of the Fourth
4 5	Amended Complaint to respond to that Fourth Amended Complaint, and such response(s) need		
6	only address those new allegations as identified in the above-referenced numbered paragraphs.		
7	I hereby attest that I have on file all holograph signatures for any signatures indicated by a		
8	"conformed" signature (/S/) within this efiled document.		
9	comormed signature (757) within this effice	i docum	Citt.
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11			LAW OFFICES OF BONNER & BONNER
12	Dated: November 7, 2011	Pw.	/S/
13	Dated. November 7, 2011	By.	A.CABRAL BONNER
14			Attorney for Plaintiffs
15			
16			
17			MIGUEL MÁRQUEZ County Counsel
18			, and the second
19	Dated: November 8, 2011	By:	/S/ GREGORY J. SEBASTINELLI
20			Deputy County Counsel
21			Attorneys for Defendants
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۷٥	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. form attached hereto as Exhibit A. Defendants shall have 30 days from the filing of the Fourth			
3	Amended Complaint to respond to it, and such response(s) need only address those new			
4	allegations as identified in Paragraphs 120.1 to 120.55 and 285 to 290.			
5	anegations as identified in ranagraphs 120.1 to 120.55 and 265 to 290.			
6	21181			
7	Dated: 11/21/11 HONORABLE RICHARD SEEBORG			
8	United States District Court Judge			
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