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10 ATTORNEYS FOR PLAINTIFF

11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA  
 13 SAN FRANCISCO DIVISION

14 KAREN TATE,  
 15 Plaintiff,

16 vs.

17 STATE OF CALIFORNIA, CALIFORNIA  
 18 DEPARTMENT OF CORRECTIONS AND  
 19 REHABILITATION; TIMOTHY  
 20 REYNOLDS; and DOES 1 to 100,

21 Defendants.

Case No.: 12-cv-01441-JST

~~STIPULATION TO FILE AMENDED  
 COMPLAINT  
 AND [PROPOSED] ORDER~~

**FILED**

MAY 13 2013

RICHARD W. WIEKING  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

22 IT IS HEREBY STIPULATED AND AGREED BY THE PARTIES, through their respective  
 23 attorneys of record, A. CABRAL BONNER of THE LAW OFFICES OF BONNER &  
 24 BONNER, attorney for Plaintiff, and David Pai, Deputy Attorney General, attorney for all  
 25 Defendants, as indicated by their signatures below, to grant Plaintiff leave to file an Amended  
 26 Complaint to incorporate new allegations which took place after Plaintiff filed her initial  
 27 complaint.

28 Good cause exists for the amendment because the new allegations included in the  
 Amended Complaint occurred after the filing of the Complaint, but generally arise out of a  
 common nucleus of operative fact as the original complaint. A copy of Plaintiff's Amended  
 Complaint is attached as Exhibit A. Modified portions are italicized.

1 **Dated: May 3, 2013**

**RESPECTFULLY SUBMITTED,  
LAW OFFICES OF BONNER & BONNER**

2  
3 /s/ A. Cabral Bonner  
4 A. Cabral Bonner  
Attorney for Plaintiff

5 **Dated: May 3, 2013**

**RESPECTFULLY SUBMITTED  
KAMALA D. HARRIS  
Attorney General of California  
MIGUEL A. NERI  
Supervising Deputy Attorney General**

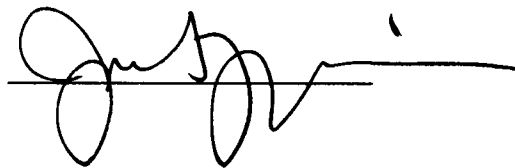
6  
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8  
9 /s/ DAVID PAI  
10 DAVID PAI  
Deputy Attorney General  
11 *Attorneys for Defendants California  
Department of Corrections and  
Rehabilitation and Timothy Reynolds*

12  
13  
14 ~~PROPOSED~~ ORDER

15  
16 IT IS SO ORDERED, PLAINTIFFS MAY FILE AN AMENDED COMPLAINT.

17 Dated: *May 13, 2013*

18 DISTRICT COURT JUDGE

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