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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 SERVICE EMPLOYEES INTERNATIONAL
11 UNION NATIONAL INDUSTRY PENSION
12 FUND; STEPHEN ABRECHT, Trustee; ROD
13 BASHIR, Trustee; KEVIN J. DOYLE, Trustee;
14 MYRIAM ESCAMILLA, Trustee; STEVEN
15 W. FORD, Trustee; EDWARD J. MANKO,
16 Trustee; FRANK A. MAXSON, Trustee; JOHN
17 J. SHERIDAN, Trustee; LARRY T. SMITH,
18 Trustee; DAVID STILWELL, Trustee,

19 Plaintiffs,

20 v.

21 EMPLOYEE EQUITY ADMINISTRATION,
22 INC., a California corporation, d/b/a Westline
23 Medical Management et al.

24 Defendants.

CASE NO.: CV 12-4494 JST

**STIPULATION FOR LEAVE TO FILE
PLAINTIFFS' FIRST AMENDED
COMPLAINT;
(PROPOSED) ORDER**

Complaint filed: August 27, 2012

Trial Date: June 30, 2014

25 Plaintiffs and all Defendants hereby stipulate and jointly request that the Court enter an order
26 as follows:

27 1. That Plaintiffs be granted leave to file a First Amended Complaint for the purpose of
28 adding additional defendants and additional claims for fraudulent transfers, aiding and abetting
fraudulent transfers and transactions to evade or avoid withdrawal liability pursuant to recently
discovered facts;

1 2. That Defendants are not waiving any rights or defenses in responding to the First
2 Amended Complaint by agreeing to this stipulation;

3 3. That the First Amended Complaint be filed within five days after the Court enters an
4 order approving this stipulation; and

5 4. That Defendants have 30 days after the filing and ECF service of the First Amended
6 Complaint within which to file their response.

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8 Dated: May 16, 2013

SALTZMAN & JOHNSON LAW CORPORATION

By: /s/ Kimberly A. Hancock

Kimberly A. Hancock
Attorneys for Plaintiffs

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11 Dated: May 16, 2013

By: /s/ Shelley R. Buchanan

SHELLEY R. BUCHANAN
Attorney for Defendants, EMPLOYEE EQUITY
ADMINISTRATION, INC., et al.

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14 Dated: May 16, 2013

JACKSON LEWIS LLP

By: /s/ Charles F. Seemann III

CHARLES F. SEEMANN III
Attorneys for Defendants, SOL HEALTHCARE
LLC; SOLNUS TWO, LLC; SOLNUS THREE,
LLC; SOLNUS FOUR, LLC

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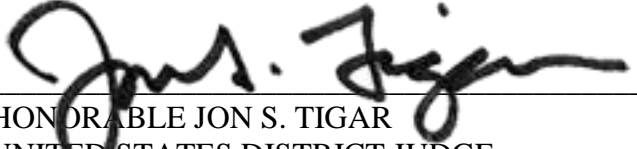
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ORDER

21 Pursuant to the above stipulation, the Court grants plaintiffs leave to file a First Amended
22 Complaint within five days after entry of this order. Defendants shall respond to the First Amended
23 Complaint within 30 days of filing and ECF service.

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25 Dated: May 16, 2013



HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE

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DECLARATION OF KIMBERLY A. HANCOCK

Pursuant to ECF General Order 45, I, Kimberly A. Hancock, declare as follows:

1. The signatories listed above, Shelley R. Buchanan, Attorney at Law, and Charles F. Seemann III, of the law firm of Jackson Lewis LLP are attorneys of record for Defendants;

2. Concurrent with the e-filing of the within Stipulation for Leave to File Plaintiffs' First Amended Complaint, authority was obtained from Shelley R. Buchanan and Charles F. Seemann III in lieu of their signatures on the Stipulation;

3. The Law Offices of Saltzman & Johnson maintains a record to support this concurrence for subsequent production for the court if so ordered for inspection upon request by a party until one year after final resolution of the within action, including appeal, if any.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was signed this 16th day of May, 2013, in San Francisco, California.

/s/ Kimberly A. Hancock
Kimberly A. Hancock