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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

THOMAS ZABOROWSKI, VANESSA  
 BALDINI, KIM DALE, and NANCY  
 PADDOCK, on behalf of themselves and  
 all others similarly situated,

Plaintiffs,

v.

MHN GOVERNMENT SERVICES, INC.  
 and MANAGED HEALTH NETWORK,  
 INC.

Defendants.

Case No. 12-CV-05109-SI

**STIPULATION AND ~~PROPOSED~~  
 ORDER GRANTING LEAVE TO FILE  
 SECOND AMENDED COMPLAINT**

1 The parties hereby stipulate as follows:

2 WHEREAS, on October 2 2012, Plaintiffs Thomas Zaborowski and Vanessa Baldini  
3 (“Plaintiffs”) filed their initial complaint;

4 WHEREAS, on November 1, 2012, Defendants MHN Government Services, Inc. and  
5 Managed Health Network, Inc.(“MHN”) filed a motion to compel arbitration; on December 21,  
6 2012, Plaintiffs filed their opposition; on January 11, 2013, MHN filed its reply; and the hearing  
7 was initially set for January 25, 2013;

8 WHEREAS, on February 5, 2013, the Court granted the parties’ stipulation requesting  
9 leave to file supplemental briefing and proposing the hearing on the arbitration be moved to  
10 March 15, 2013 (Docket No. 38);

11 WHEREAS, on February 8, 2013, Plaintiffs filed their First Amended Complaint (Docket  
12 No. 40);

13 WHEREAS, since then, Plaintiffs’ counsel have been contacted by additional individuals  
14 who wish to assert state law claims not included in the First Amended Complaint;

15 WHEREAS, attached hereto as Exhibit A is Plaintiffs’ Second Amended Complaint; and

16 WHEREAS, the parties agree that MHN’s deadline to answer or otherwise respond to  
17 Plaintiffs’ Second Amended Complaint shall be twenty (20) days after the Court’s ruling on the  
18 arbitration motion.

19 The parties respectfully request that the Court (1) allow Plaintiffs to file their Second  
20 Amended Complaint, and (2) allow MHN to answer or otherwise respond to Plaintiffs’ Second  
21 Amended Complaint twenty (20) days after the Court’s ruling on the arbitration motion:

22 IT IS SO STIPULATED.

23 Dated: March 5, 2013

By: /s/ Allen R. Vaught  
Allen R. Vaught

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*Attorneys for Plaintiffs and proposed Class members*

Dated: March 5, 2013

By: /s/ Timothy J. Long  
Timothy J. Long

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PURSUANT TO STIPULATION, IT IS SO ORDERED.



Dated: March 8, 2013

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The Honorable Susan Illston  
United States District Judge