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Attorney for Plaintiff
ALEXANDRA POLAKOVIC

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ALEXANDRA POLAKOVIC, an
individual,

Case No. C 3:14-cv-03424 MEJ

Plaintiff,

STIPULATION WITH PROPOSED
ORDER TO ALLOW FILING OF
FIRST AMENDED COMPLAINT

v.

ELECTRONIC DOCUMENT
PROCESSING, INC., a California
corporation; PRESCOTT
WOODFORD, individually and in his
official capacity, et al.,

Judge: Hon. Maria-Elena James
Ctm : Courtroom B, 15th Floor
Loc'n : 450 Golden Gate Avenue
San Francisco CA 94102

Defendants.

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The parties, Plaintiff, ALEXANDRA POLAKOVIC, and Defendants,
ELECTRONIC DOCUMENT PROCESSING, INC. and PRESCOTT WOODFORD,
each through their respective counsel, hereby stipulate to the following:

1. Defendants ELECTRONIC DOCUMENT PROCESSING, INC. (“EDP”) and
WOODFORD would like to remove certain affirmative defenses from their answer
filed on 11/21/2014, to avoid a motion to strike affirmative defenses by plaintiff;

2. Plaintiff would like to add two paragraphs to her complaint regarding
entitlement to injunctive relief. A copy of the proposed first amended complaint is

1 attached hereto as Exhibit 1. The proposed new allegations are paragraph numbers
2 98 and 99, on page 25 of Exhibit 1.

3 3. Pursuant to Case Management Order, the parties have until March 2, 2015
4 to file amended pleadings.

5 4. Pursuant to the foregoing, the parties request an order from the Court as
6 follows:

- 7 (a) allowing plaintiff to file a first amended complaint (FAC) forthwith;
8 (b) order defendants to file an answer to the FAC by March 13, 2015; and
9 (c) giving plaintiff until March 17, 2015 to file a motion to strike defendants'
10 answer to the FAC.

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12 DATED: March 2, 2015

_____/s/ James A. Michel_____
JAMES A. MICHEL
Attorney for Plaintiff
ALEXANDRA POLAKOVIC

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15 DATED: March 2, 2015

_____/s/ Jonathan M. Blute_____
JONATHAN M. BLUTE
Murphy, Pearson, Bradley & Feeney
Attorneys for Defendants
ELECTRONIC DOCUMENT
PROCESSING, INC. and PRESCOTT
WOODFORD

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19 Signature Attestation pursuant to L.R. 5-1 (i)(3)

20 James Michel hereby attests that concurrence in the filing of the document
21 has been obtained from each of the other Signatories, which shall serve in lieu of
22 their signatures on the document.

23 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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25 DATED: _____

HON. MARIA-ELENA JAMES
UNITED STATES MAGISTRATE JUDGE

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