

1 DAVID I. DALBY (SBN 114750)  
 2 HINSHAW & CULBERTSON LLP  
 3 One California Street, 18th Floor  
 4 San Francisco, CA 94111  
 5 Telephone: 415-362-6000  
 6 Facsimile: 415-834-9070

7  
 8  
 9  
 10  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25  
 26  
 27  
 28

Attorneys for Defendant  
 ANASON WON PAK

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

EILEEN BROWN; PRENTISS BELTON;  
 MICHELLE HARRIS; EVELYN JONES-  
 MACGLAUN; ETHEL BENSON; KEISHA  
 FINLEY; KEISHA JONES; DOROTHA  
 GRAHAM; BARBARA KERLEGAN;  
 CORINNE HARPER; DEENA PERKING;  
 LESSIE BROWN; SABRINA PARISH;  
 ELLYN GINDEN-COOPER; TANYA  
 TWYMAN; ZELPHIA CONNER;  
 ANTOINETTE BLUE; and LAWSHAWN  
 JEFFRIES,

Plaintiffs,

vs.

FREEDOM WEST HOMES, INC.; ALTON  
 MANAGEMENT CORPORATION;  
 WILLIAM HUTTON; RAYMOND BROWN;  
 ANASON WON PAK; and DOES 1 – 50,

Defendants.

Case No. 15-CV-04874-EMC

**STIPULATION BY DEFENDANT ANASON  
 W. PAK AND PLAINTIFFS THAT PAK'S  
 ANSWER TO THE FIRST AMENDED  
 COMPLAINT BE DEEMED PAK'S  
 ANSWER TO THE SECOND AMENDED  
 COMPLAINT; [PROPOSED] ORDER**

Complaint Filed: October 22, 2015

TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

Whereas, defendant Anason W. Pak filed an answer to plaintiffs' first amended complaint on May 6, 2016;

Whereas, plaintiffs filed a second amended complaint on July 21, 2016 that is 49 pages long and contains 421 paragraphs;

1 Now therefore, by and through their respective attorneys of record, defendant Anason W. Pak  
2 and plaintiffs hereby stipulate that Pak's answer to plaintiffs' first amended complaint is deemed  
3 Pak's answer to plaintiffs' second amended complaint; Pak incorporates by this reference his denial  
4 of the plaintiffs' allegations and his affirmative defenses asserted in his answer to the first amended  
5 complaint and Pak denies the allegations of the second amendment complaint.

6 IT IS SO STIPULATED

7  
8 DATED: August 3, 2016

HINSHAW & CULBERTSON LLP

9  
10 /s/ David I. Dalby  
11 DAVID I. DALBY  
12 Attorneys for Defendant  
ANASON WON PAK

13 DATED: August 3, 2016

PERETZ & ASSOCIATES

14  
15 /s/ Yosef Peretz  
16 YOSEF PERETZ  
17 Attorneys for Plaintiffs  
18 EILEEN BROWN; PRENTISS BELTON; MICHELLE  
19 HARRIS; EVELYN JONES-MACGLAUN; ETHEL  
20 BENSON; KEISHA FINLEY; KEISHA JONES;  
DOROTHA GRAHAM; BARBARA KERLEGAN;  
CORINNE HARPER; DEENA PERKING; LESSIE  
BROWN; SABRINA PARISH; ELLYN GINDEN-  
COOPER; TANYA TWYMAN; ZELPHIA CONNER;  
ANTOINETTE BLUE; AND LAWSHAWN JEFFRIES

21 PURSUANT TO STIPULATION OF THE PARTIES, IT IS SO ORDERED.

22 DATED: August <sup>4</sup>, 2016

