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7 Attorneys for D.W. and SHAMON BLUE, Plaintiffs

8 UNITED STATES DISTRICT COURT  
 9  
 10 NORTHERN DISTRICT OF CALIFORNIA  
 11  
 12 SAN FRANCISCO DIVISION

13 D.W., a minor, et al.  
 14 Plaintiffs,  
 15 vs.  
 16 VASONA MANAGEMENT, INC., a  
 17 California corporation et al.  
 18 Defendants  
 19  
 20  
 21

Case No. 4:18-cv-00195-JST  
**STIPULATION AND ~~PROPOSED~~  
 ORDER FOR LEAVE TO FILE SECOND  
 AMENDED COMPLAINT**

1 IT IS HEREBY STIPULATED, BY AND BETWEEN PLAINTIFFS D.W. and  
2 SHAMON BLUE (collectively, "Plaintiffs") and Defendants VASONA MANAGEMENT, INC.,  
3 a California corporation and CATALINA CREST, LLC, a California limited liability company  
4 (collectively, "Defendants"), through their counsel of record, that Plaintiffs may file a Second  
5 Amended Complaint in order to add additional alleged accessibility barriers identified by  
6 Plaintiffs' expert at the General Order 56 inspection and subsequent alleged incidents of  
7 discrimination.

8 A True and correct copy of the proposed Second Amended Complaint with the  
9 substantive changes highlighted is attached hereto as **Exhibit "A"**.

10  
11 Respectfully submitted,

12  
13 Dated: March 19, 2019

14 /s/ Irakli Karbelashvili  
15 By Irakli Karbelashvili, Attorney for Plaintiffs  
16 D.W. and SHAMON BLUE

17 Dated: March 21, 2019

18 /s/ Ronnie Shou  
19 By Ronnie Shou, Attorney for Defendants  
20 VASONA MANAGEMENT, INC., a California  
21 corporation and CATALINA CREST, LLC

22 **Filer's Attestation**

23 I, Irakli Karbelashvili, attest that I received concurrence from Defendants' counsel in  
24 the filing of this document.

25 /s/ Irakli Karbelashvili  
26 By Irakli Karbelashvili

1 **[PROPOSED] ORDER**

2 Based upon the foregoing Stipulation and good cause appearing, IT IS SO ORDERED.  
3 Plaintiffs shall file the Second Amended Complaint as a separate docket entry.

4  
5  
6 **IT IS SO ORDERED.**

7  
8 Dated: March 22, 2019

9   
United States District Judge