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10	[Additional Counsel Appear on Signature Page]			
11	Attorneys for Plaintiffs			
12	UNITED STATES DISTRICT COURT			
13	NORTHERN DISTRICT OF CALIFORNIA			
14	OAKLAND DIVISION			
15				
16	Phyllis Wehlage, on her behalf and on behalf of others similarly situated,	Case No. 4:10-cv-05839-CW		
17	Plaintiffs,	STIPULATION AND [PROPOSED] ORDER RE REPLY TO OPPOSITION TO		
18	V.	MOTION FOR LEAVE TO AMEND COMPLAINT AND MOTION TO DISMISS		
19	EmpRes Healthcare, Inc.; EHC	The Honorable Claudia Wilken		
20	Management LLC; EHC Financial Services LLC; Evergreen California Healthcare			
21	LLC; Evergreen at Arvin LLC; Evergreen at Bakersfield LLC; Evergreen at Lakeport			
22	LLC; Evergreen at Heartwood LLC; Evergreen at Springs Road LLC; Evergreen			
23	at Tracy LLC; Evergreen at Oroville LLC; Evergreen at Petaluma LLC; Evergreen at			
24	Gridley (SNF) LLC; and DOES 1 through 100,			
25	Defendants.			
26	Detendants.			
27				
28				
	050169 1	- 1 - STIPULATION & [PROPOSED] ORDER		

STIPULATION & [PROPOSED] ORDER CASE NO. 4:10-CV-05839-CW

1	Pursuant to Civil Local Rules 6-2 and 7-12, the parties submit the following stipulation:			
2	Whereas on November 21, 2011 Defe	Whereas on November 21, 2011 Defendants filed an opposition to Plaintiffs' motion for		
3	3 leave to amend the complaint and motion to d	leave to amend the complaint and motion to dismiss;		
4	4 Whereas the Court held that Plaintiffs	Whereas the Court held that Plaintiffs must file a response within seven days (Doc. #79);		
5	5 Whereas November 24, 2011 is the T	Whereas November 24, 2011 is the Thanksgiving holiday;		
6	Whereas no other scheduling modifications have been requested pertaining to Plaintiffs'			
7	amended complaint;			
8	Whereas the Court has not yet set a hearing date for the motions or a case management			
9	conference;			
10	NOW THEREFORE, it is stipulated that deadline for Plaintiffs to file a combined			
11	response to Defendants' opposition to motion for leave to amend, as well as Defendants' motion			
12	to dismiss, shall be December 6, 2011.	to dismiss, shall be December 6, 2011.		
13	13			
14	Dated: November 23, 2011 Respec	etfully submitted,		
15	WROT	EN & ASSOCIATES, INC.		
16	16			
17	By:	/s/ Laura K. Sitar		
18	18	Laura K. Sitar		
19	WROT Kippy	EN & ASSOCIATES, INC. L. Wroten, State Bar No. 134325 2		
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21		sitar@wrotenlaw.com A. Ross, State Bar No. 180022		
22		: dross@wrotenlaw.com ifica, Suite 1100		
23		California 92618 one: (949) 788-1790 6		
24	Facsim	ile: (949) 788-1799		
25	25 Attorne	eys for Defendants		
26	26			
27	27			

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1		
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26	I	an Francisco, CA 94105
27	A	ttorneys for Plaintiffs
28		

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1 2	Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from Laura K. Sitar.
3	
4	[PROPOSED] ORDER
5	PURSUANT TO STIPULATION, IT IS SO ORDERED.
6	Dated: 12/1/2011
7	Dated: 12/1/2011
8	Habital Wilken
9	HOTA CLITODIT WILKEN
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