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4 Attorney for Plaintiff  
5 STANLEY DAY

6 UNITED STATES DISTRICT COURT  
7 NORTHERN DISTRICT OF CALIFORNIA  
8 OAKLAND DIVISION

9 STANLEY DAY, an individual,

10 Plaintiff,

11 v.

12 BECHTEL POWER CORPORATION, a  
California corporation; BECHTEL GROUP,  
13 INC., a California corporation; and DOES 1  
through 20 inclusive,

14 Defendants.

Case No. CV 13-02378 CW

**STIPULATION AND ~~PROPOSED~~  
ORDER FOR LEAVE TO FILE FIRST  
AMENDED COMPLAINT**

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17 TO THE CLERK OF THE ABOVE-ENTITLED COURT:

18 All parties and counsel of the case stipulate to the filing of Plaintiff STANLEY DAY's  
19 First Amended Complaint (attached to this stipulation as **Exhibit 1**), which makes two  
20 significant changes to the original state court complaint: (1) removal of BECHTEL POWER  
21 CORPORATION and BECHTEL GROUP, INC. as defendants, and (2) addition of BECHTEL  
22 CONSTRUCTION COMPANY as a defendant.

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STIPULATION AND ~~PROPOSED~~ ORDER FOR LEAVE TO FILE FIRST AMENDED  
COMPLAINT

1 Furthermore, the parties stipulate that the Answer already on file be deemed the answer  
2 by Bechtel Construction Company to this First Amended Complaint since there are no material  
3 changes to the First Amended Complaint from the original state court complaint.

4 Dated: August 5, 2013

LAW OFFICES OF RICHARD WAHNG

5 /s/ Ray H. Choi

6 RAY H. CHOI  
7 Attorney for Plaintiff

8 Dated: August 5, 2013

OGLETREE, DEAKINS, NASH

9 /s/ Thomas McInerney

10 THOMAS MCINERNEY  
11 Attorney for Defendants

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14 IT IS HEREBY ORDERED that Plaintiff is granted leave to file his First Amended  
15 Complaint within ten (10) days of the signing of this order.

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17 Date: 8/7/2013

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19 THE HON. CLAUDIA WILKEN  
20 Chief District Judge

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STIPULATION AND ~~PROPOSED~~ ORDER FOR LEAVE TO FILE FIRST AMENDED  
COMPLAINT