1 2	Cary Kletter (SBN 210230) Sally Trung Nguyen (SBN 267275)		
3	KLETTER LAW FIRM LLP 1900 S. Norfolk Street, Suite 350		
4	San Mateo, California 94403 415.434.3400		
5	Attorneys for Plaintiff, LINDA LE		
6	UNITED STATES DISTRICT COURT		
7	NORTHERN DISTRICT OF CALIFORNIA		
8			
9	LINDA LE,	Case No.: C 14-02225 KAW	
10	PLAINTIFF,	STIPULATION AND PROPOSED ORDER REGARDING	
11	V.	AMENDING COMPLAINT	
12	JPMORGAN CHASE BANK and DOES 1		
13	- 20, inclusive,		
14	DEFENDANTS.		
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16			
17	STIPULATION		
18	Plaintiff LINDA LE ("LE") and Defendant JPMORGAN CHASE BANK ("CHASE"),		
19	through their counsel of record, hereby stipulate as follows:		
20	WHEREAS, LE filed an action with the following claims: (1) Pregnancy Discrimination;		
21	(2) California Family Rights Act ("CFRA") Interference; (3) CFRA Discrimination/Retaliation;		
21	(4) Fair Employment and Housing Act ("FEHA") Retaliation; (5) Wrongful Termination in Violation of Public Policy; (6) Discrimination on the Basis of Disability; (7) Failure to		
•	Accommodate Disability; (8) Failure to Engage in the Interactive Process; (9) Failure to Provide		
23	Seating; and (10) Unfair Business Practices;		
24	WHEREAS, CHASE filed a Notice of Removal of Civil Action (Federal Question and		
25	Diversity) ("Removal");		
26	WHEREAS, counsel for all parties have agreed to allow LE to file the Attached First		
27	Amended Complaint;		
28	STIPULATION AND PROPOSED ORDER REGARDING AMENDING COMPLAINT C 14-02225 KAW		

1	WITTER AG and this last have not and		
2	WHEREAS, no trial date has been set; and		
3	WHEREAS, none of the parties would be prejudiced by allowing LE to file the First		
4	Amended Complaint.		
5	THEREFORE, IT IS HEREBY STIPULATED AND AGREED that LE may file the		
6	attached First Amended Complaint.		
7	Dated: June 10, 2014 KLETTER LAW FIRM LLP		
8	CARY KLETTER SALLY TRUNG NGUYEN		
9			
10	By: and		
11	Cary Kløtter		
12	Attorney for Plaintiff Linda Le		
13			
14	Date: June 10, 2014 SANCHEZ & AMADOR, LLP		
15	JAMIE RUDMAN		
16			
17	By: Jamie Rudman		
18	Attorney for Defendant		
19	JPMorgan Chase Bank		
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	STIPULATION AND PROPOSED ORDER REGARDING AMENDING COMPLAINT C 14-02225 KAW		

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7	UNITED STATES DISTRICT COURT	
8	NORTHERN DISTRICT OF CALIFORNIA	
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10	LINDA LE,	Case No. C 14-02225 KAW
11	Plaintiff,	
12	vs.	[PROPOSED] ORDER REGARDING FILING FIRST AMENDED COMPLAINT
13	JPMORGAN CHASE BANK, and DOES 1 THROUGH 20, inclusive,	FILLING FIRST AMENDED COMILIANIN
14	Defendants.	
15		
16	Pursuant to the stipulation of the parties, and for good cause shown, IT IS HEREBY	
17	ORDERED that Plaintiff Linda Le is granted leave to file the First Amended Complaint.	
18		
19	PURSUANT TO STIPULATION, IT IS SO ORDERED. Date: 6/11/14 Kandis Westmore	
20	Date: 6/11/14	The Nonorable Kandis A. Westmore
21		United States District Court Judge
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27		
28	STIPULATION AND PROPOSED O	RDER REGARDING AMENDING COMPLAINT
	C 14-02225 KAW	