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14 **UNITED STATES DISTRICT COURT FOR THE**
 15 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

16 DOE I, DOE II, Ivy HE, DOE III, DOE
 17 IV, DOE V, DOE VI, ROE VII, Charles
 LEE, ROE VIII, and LIU Guifu, and
 those individual similarly situated,

Case No. 5:11-cv-02449-JF-PSGx
 Assigned to the Hon. Jeremy Fogel

**NOTICE OF ERRATA RE: FIRST
 AMENDED CLASS ACTION
 COMPLAINT**

18
19 Plaintiffs,

20 vs.

21 CISCO SYSTEMS, INC., John
 22 CHAMBERS, Thomas LAM, Owen
 23 CHAN, Fredy CHEUNG, and DOES 1-
 24 100,

25 Defendants.

1 **TO THE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS OF**
2 **RECORD:**

3 Please take notice that counsel for Plaintiffs DOE I, DOE II, Ivy HE, DOE III,
4 DOE IV, DOE V, DOE VI, ROE VII, Charles LEE, ROE VIII, and LIU Guifu
5 (collectively, "Plaintiffs") inadvertently uploaded the incorrect file, containing an earlier
6 draft, when e-filing the First Amended Complaint ("FAC") on September 2, 2011 (Docket
7 Entry 61). The correct file with the final version of the First Amended Complaint will be
8 uploaded hereafter and titled "Corrected First Amended Complaint."

9 The three paragraphs where there are differences between the erroneously uploaded
10 document (FAC) and the correct document (Corrected FAC) are as follows:

11 FAC ¶ 147:

12 During their interrogation of Doe II, the police subjected her to severe mental and
13 physical abuse, so much so that she falsely confessed to crimes she subsequently denied at
14 her trial.

15 CORRECTED ¶ 147:

16 During the interrogation of Doe II, the police subjected her to severe mental and
17 physical abuse, so much so that she *characterized as "criminal" acts that are perfectly*
18 *legal under Chinese and international law.*

19 FAC ¶ 158:

20 At the police station, Public Security officers interrogated her continuously for
21 many hours in order to force her to falsely confess to crimes she believed she did not
22 commit. They poured ice-cold water over her naked body and forced her to stand in a
23 bucket of ice. She was also kicked, beaten, insulted and subjected continuously to other
24 forms public humiliation, and mental and physical torture.

25 CORRECTED ¶ 158:

26 At the police station, Public Security officers interrogated her continuously for
27 many hours in order to force her to *characterize acts that are perfectly legal under*
28 *Chinese and international law as "crimes."* They poured ice-cold water over her naked

1 body and forced her to stand in a bucket of ice. She was also kicked, beaten, insulted and
2 subjected continuously to other forms public humiliation, and mental and physical torture.

3 FAC ¶ 194:

4 The next day, Public Security officers took Doe VI to Weifang City detention
5 center. While at the detention center, he was subjected to continuous interrogation and
6 torture to force him to falsely confess to criminal conduct and to abandon the practice of
7 Falun Gong. He was not formally charged until almost a month later.

8 CORRECTED ¶ 194:

9 The next day, Public Security officers took Doe VI to Weifang City detention
10 center. While at the detention center, he was subjected to continuous interrogation and
11 *other forms of torture to force him to characterize activities that are legal under Chinese*
12 *and international law as "crimes"* and to abandon the practice of Falun Gong. He was not
13 formally charged until almost a month later.

14
15 DATED: September 2, 2011

Respectfully submitted,

16 SCHWARCZ, RIMBERG, BOYD &
17 RADER, LLP

18
19 By: /s/ K. Lee Crawford-Boyd

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27 To be admitted *pro hac vice*
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