

HONORABLE JAMES L. ROBERT

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SUSAN CHEN, et. al.,

Plaintiffs,

vs.

NATALIE D'AMICO, et al.,

Defendants.

CIVIL ACTION NO. 16-cv-01877-JLR

**STIPULATED MOTION AND ORDER
FOR LEAVE TO FILE FOURTH
AMENDED COMPLAINT**

Pursuant to F.R.C.P. 15(a)(2) and LCR 15, Plaintiffs, by and through their counsel of record, hereby respectfully submit this Stipulated Motion for Leave to File Fourth Amended Complaint. All opposing parties, by and through their counsel of record, have provided their written consent to the filing of the proposed Fourth Amended Complaint and hereby stipulate to its filing, without waiver of all arguments available to them as to the claims and allegations asserted therein.

Pursuant to LCR 15, the proposed amended pleading is attached as **Exhibit A** hereto and a redline indicating how the proposed amended pleading differs from the operative complaint (the Third Amended Complaint, Dkt. #91) is attached as **Exhibit B** hereto.

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STIPULATED MOTION FOR LEAVE
TO FILE AMENDED COMPLAINT
16-cv-01877-JLR

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1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

2 DATED: July 27, 2018.

3
4 DORSEY & WHITNEY LLP

OGDEN MURPHY WALLACE, PLLC

5 /s/ Shawn Larsen-Bright

/s/ Aaron P. Riensche, per email auth.

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15 *Court-Appointed Attorneys for Plaintiff Susan*

Counsel for Defendants City of Redmond,

16 *Chen, individually, and as FRCP 17 Guardian*

Natalie D'Amico, Redmond Police

17 *Ad Litem for Plaintiff JL*

Department, Ron Gibson, and Kristi Wilson

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ASSISTANT ATTORNEY GENERAL

19 /s/ Michael David Myers, per email auth.

/s/ Scott M. Barbara, per email auth.

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27 *Litem for Plaintiff LL*

Timothy Earwood, Jill Kegel, Bill Moss,

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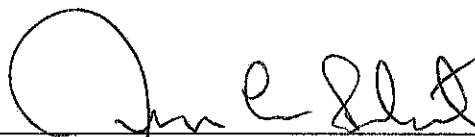
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

(DKT. # 94-1)

Plaintiffs must file and serve the amended pleading on all parties within fourteen (14) days
of the filing of this Order.

DATED: July 30, 2018



THE HONORABLE JAMES L. ROBART
UNITED STATES DISTRICT COURT JUDGE



CERTIFICATE OF SERVICE

I hereby certify that on this date I caused to be served the foregoing on the following counsel of record by the method indicated:

<p>Aaron P. Riensche, WSBA No. 37202 Geoff J. M. Bridgman, WSBA No. 25242 Daniel F. Shickich, WSBA No. 46479 OGDEN MURPHY WALLACE, PLLC 901 5th Ave., Ste. 3500 Seattle, WA 98164-2008 T: 206-447-7000 F: 206-447-0215 E: ariensche@omwlaw.com E: gbridgman@omwlaw.com E: dshickich@omwlaw.com <i>Counsel for Defendants City of Redmond, Natalie D'Amico, Redmond Police Department, Ron Gibson, and Kristi Wilson</i></p>	<p><input type="checkbox"/> Via Messenger <input type="checkbox"/> Via Facsimile <input type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Electronic Mail <input checked="" type="checkbox"/> Via ECF Notification</p>
<p>Michael David Myers, WSBA No. 22486 MYERS & COMPANY, PLLC 1530 Eastlake Avenue East Seattle, Washington 98102 Tel. (206) 398-1188 E: mmyers@myers-company.com <i>Attorneys for Plaintiff Naixiang Lian, individually, and as FRCP 17 Guardian Ad Litem for LL</i></p>	<p><input type="checkbox"/> Via Messenger <input type="checkbox"/> Via Facsimile <input type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Electronic Mail <input checked="" type="checkbox"/> Via ECF Notification</p>
<p>Scott M. Barbara, WSBA No. 20885 ASSISTANT ATTORNEY GENERAL Torts Division, Seattle 800 5th Ave., Ste. 2000 Seattle, WA 98104 Phone: (206) 389-2033 / 206-464-7352 Fax: (206) 587-4229 E: scottb2@atg.wa.gov <i>Counsel for DSHS, Kimberly Danner, Timothy Earwood, Jill Kegel, Bill Moss, Kevin Quigley, and Tom Soule</i></p>	<p><input type="checkbox"/> Via Messenger <input type="checkbox"/> Via Facsimile <input type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Electronic Mail <input checked="" type="checkbox"/> Via ECF Notification</p>

Dated this 27th day of July, 2018.

/s/ Molly Price
 Molly Price