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Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

ANN HENEGHAN, individually, and as Personal Representative of the Estate of CATHLEEN DELIA ROSS

Plaintiffs,

V.

CROWN CRAFTS INFANT PRODUCTS, INC., d/b/a NOEL JOHANNA, INC. a Delaware Corporation;

Defendant.

NO. 3:10-cv-5908 RJB

STIPULATED MOTION TO FILE AMENDED COMPLAINT

Noted For Consideration:

April 28, 2011

I. STIPULATED MOTION

COME NOW the parties in the above captioned action and hereby move the Court in the above entitled action to grant the parties stipulated motion to file the attached Amended Complaint for Damages and Wrongful Death. The purpose of the amendment is to add John Ross, Cathleen Delia Ross's father, as a plaintiff, and to add William Sears, M.D. and Sears Family Pediatrics as Defendants. Discovery has revealed that Dr. Sears was involved in the development, design, and promotion of the "Nojo – The Original Baby Sling" and may also responsible for Cathleen Delia Ross's death.

DATED this 15th day of April, 2011.

STIPULATED MOTION TO FILE AMENDED COMPLAINT - I (3:10-cv-5908 RJB)

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2		
3	By <u>/s/ Micah R. LeBank</u> John R. Connelly, Jr., WSBA # 12183	By /s/ Morgan E. Smith Christopher W. Tompkins, WSBA #11686
4	Micah R. LeBank, WSBA # 38047 2301 North 30th Street	Morgan Emmerton Smith, WSBA #37954 701 Pike Street, Suite 1400
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8	Attorneys for Plaintiffs	Attorney for Defendants
9		
10	II.	ORDER
11	THIS MATTER, having come before the Court on the parties Stipulated Motion to	
12	File Amended Complaint for Damages and Wrongful Death and the Court having reviewed	
13	the records and files herein, the parties Stipulated Motion to File Amended Complaint for	
14	Damages and Wrongful Death is hereby GRANTED.	
15	DATED and this 26 ay of April, 2011.	
16	To live 17	
17		The Hannahla Rabert 1/2 years
18		The Honorable Robert J Bryan UNITED STATES DISTRICT JUDGE
19	Presented by:	
20	CONNELLY LAW OFFICES	
21		
22	By <u>/s/ Micah R. LeBank</u> John R. Connelly, Jr., WSBA No. 1218	2
23	Micah R. LeBank, WSBA No. 38047	J
24	2301 North 30th Street Tacoma, WA 98403	
25	Phone: (253) 593-5100 E-mail: jconnelly@connelly-law.com	
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	Attorneys for Plaintiffs STIPULATED MOTION TO FILE AMENDED C (3:10-cv-5908 RJB)	OMPLAINT - 2

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