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9
 10 IN THE UNITED STATES DISTRICT COURT
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 12 OAKLAND DIVISION

13
 14 **ESTHER DARLING; RONALD BELL by**
his guardian ad litem Rozene Dilworth;
 15 **GILDA GARCIA; WENDY HELFRICH by**
her guardian ad litem Dennis Arnett;
 16 **JESSIE JONES; RAIF NASSYROV by his**
guardian ad litem Sofiya Nasyrova; ALLIE
 17 **JO WOODARD, by her guardian ad litem**
Linda Gaspard-Berry; individually and on
 18 **behalf of all others similarly situated,**

19 Plaintiffs,

20 v.

21 **TOBY DOUGLAS, Director of the**
 22 **Department of Health Care Services, State**
 23 **of California, DEPARTMENT OF**
HEALTH CARE SERVICES,

24 Defendants.

C09-03798 SBA (NC/JSC)

CLASS ACTION

**STIPULATION AND ORDER RE
ADDENDUM TO SETTLEMENT
AGREEMENT**

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1 In order to resolve all issues raised by plaintiffs' Motion for Enforcement of Stipulated
2 Judgment and for Civil Contempt Sanctions [Docket No. 448], the parties hereby stipulate that
3 Exhibit A attached hereto shall be an Addendum to the Settlement Agreement approved by this
4 Court on January 25, 2012 [Docket No. No. 438-1].

5
6 Respectfully submitted,

7 DISABILITY RIGHTS CALIFORNIA
8 AARP FOUNDATION LITIGATION
9 NATIONAL SENIOR CITIZENS LAW CENTER
10 NATIONAL HEALTH LAW PROGRAM
11 MORRISON & FOERSTER LLP

12 Dated: April 3, 2012 By: /s/
13 Elissa Gershon
14 Attorneys for Plaintiffs

15 KAMALA D. HARRIS
16 Attorney General of California
17 SUSAN M. CARSON
18 Supervising Deputy Attorney General

19 Dated: April 3, 2012 By: /s/
20 Susan M. Carson
21 Attorneys for Defendants

22 Filer's Attestation: Pursuant to General Order No. 45, § X(B), I attest under penalty of
23 perjury that concurrence in the filing of the document has been obtained from each of its
24 signatories.

25 Dated: April 3, 2012 By: /s/
26 Susan M. Carson

27 PURSUANT TO STIPULATION, IT IS SO ORDERED.

28 Dated: 4/13/12

HONORABLE SAUNDRA BROWN ARMSTRONG
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA