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TOWN OF PARADISE

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

TOWN OF PARADISE,

Plaintiff,

v.

ERNST & YOUNG, LLP,

Defendant.

Case No. 2:26-cv-00410-DJC-JDP

STIPULATION FOR AMENDMENT; AND ORDER

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

COLE HUBER LLP
2281 LAVA RIDGE COURT, SUITE 300
ROSEVILLE, CALIFORNIA 95661

STIPULATION TO AMEND

Plaintiff TOWN OF PARADISE filed its Complaint against Defendant ERNST & YOUNG, LLP, on February 12, 2026. Following service, the parties met and conferred on Defendant's contemplated motion to dismiss. By stipulation and approval of the Court, Plaintiff filed a First Amended Complaint. The parties then met and conferred on Defendant's intended motion to dismiss the First Amended Complaint. Defendant filed a motion to dismiss the First Amended Complaint on May 29, 2026. Following Defendant's filing of its motion, the parties conferred on further amendment to avoid unnecessary motion practice. The parties agreed to stipulate to Plaintiff's filing of a Second Amended Complaint.

Under Federal Rule of Civil Procedure 15(a)(2), the parties thus stipulate that Plaintiff, unless the Court directs otherwise, may amend its First Amended Complaint and file a Second Amended Complaint within twenty (20) days of the date the Court approves this stipulation. The parties also stipulate that Defendant will, unless the Court directs otherwise, respond to the Second Amended Complaint within twenty-one (21) days after service of the Second Amended Complaint. The parties further stipulate that Defendant's pending motion to dismiss will be withdrawn without prejudice.

SO STIPULATED.

Dated: June 10, 2026

COLE HUBER LLP

By: ***/s/ Tyler J. Sherman***
Scott E. Huber
Samuel L. Emerson
Tyler J. Sherman
Attorneys for Plaintiff TOWN OF PARADISE

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Dated: June 10, 2026 BOUTIN JONES, INC

By: ***/s/ Shea J. Kenny***
Robert D. Swanson
Shea J. Kenny
Attorneys for Defendant ERNST & YOUNG

ORDER

Having reviewed the Parties' Stipulation, IT IS SO ORDERED.

Dated: June 10, 2026

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE

COLE HUBER LLP
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