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7 [Additional Counsel Appear On Signature Page]

8
 9 UNITED STATES DISTRICT COURT FOR THE
 EASTERN DISTRICT OF WASHINGTON

10 CYNTHIA HARVEY, individually and
 on behalf of all others similarly situated,

11 Plaintiff,

12 v.

13
 14 CENTENE MANAGEMENT
 COMPANY, LLC and COORDINATED
 CARE CORPORATION,
 15

16 Defendants.

NO. 2:18-cv-00012-SMJ

**STIPULATION TO FILE SECOND
 AMENDED COMPLAINT**

17
 18 Plaintiff Cynthia Harvey (“Plaintiff”) and Defendants Centene Management
 19 Company, LLC (“Centene”) and Coordinated Care Corporation (“Coordinated
 20

1 Care”) (Plaintiff and Defendants are collectively referred to as the “Parties”),
2 through their respective counsel, hereby stipulate as follows:

3 WHEREAS Defendants argued for the first time in their Motion to Dismiss
4 Plaintiff’s First Amendment Complaint that the Washington filed rate doctrine bars
5 Plaintiff’s claims;

6 WHEREAS Plaintiff asked Defendants to consent to Plaintiff filing a
7 Second Amended Complaint to address the Washington filed rate doctrine;

8 WHEREAS Defendants consented to Plaintiff filing a Second Amended
9 Complaint, and Defendants will respond to the Second Amended Complaint as
10 provided by Fed. R. Civ. P. 15(a)(3);

11 THEREFORE, pursuant to Fed. R. Civ. P. 15(a)(2), the Parties stipulate,
12 agree, and consent to the filing of Plaintiff’s Second Amended Complaint.

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1 STIPULATED TO, DATED AND RESPECTFULLY SUBMITTED this

2 29th day of August, 2018.

3 TERRELL MARSHALL LAW
4 GROUP PLLC

WILLIAMS & CONNOLLY LLP

5 By: /s/ Beth E. Terrell, WSBA #26759

By: /s/ Steven M. Cady, Pro Hac Vice

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CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on August 29, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED this 29th day of August, 2018.

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