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**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

HEALTH FREEDOM DEFENSE  
FUND, INC., a Wyoming Not-for-  
Profit Corporation; CALIFORNIA  
EDUCATORS FOR MEDICAL  
FREEDOM, an unincorporated  
association, MIGUEL SOTELO;  
JEFFREY FUENTES; SANDRA  
GARCIA; and HOVHANNES  
SAPONGHIAN; NORMA  
BRAMBILA

Plaintiffs,

v.

ALBERTO CARVALHO, in his  
official capacity as Superintendent of  
the Los Angeles Unified School  
District; ILEANA DAVALOS, in her  
official capacity as Chief Human  
Resources Officer for the Los Angeles  
Unified School District; GEORGE  
MCKENNA, MÓNICA GARCÍA,  
SCOTT SCHMERELSON, NICK  
MELVOIN, JACKIE GOLDBERG,  
KELLY GONEZ, and TANYA ORTIZ  
FRANKLIN, in their official capacities  
as members of the Los Angeles

Case No.: 2:21-cv-08688-DSF-PVC

**ORDER APPROVING  
STIPULATION FOR LEAVE TO  
FILE SECOND AMENDED  
COMPLAINT [63]**

[Fed.R.Civ.P. Rule 15(a)(2)]

1 Unified School District governing  
board.

2 Defendants.

3  
4 **ORDER**

5 Having read and considered the Stipulation submitted by Plaintiffs HEALTH  
6 FREEDOM DEFENSE FUND, INC., CALIFORNIA EDUCATORS FOR  
7 MEDICAL FREEDOM, MIGUEL SOTELO, JEFFREY FUENTES, SANDRA  
8 GARCIA, HOVHANNES SAPONGHIAN, and NORMA BRAMBILA and  
9 Defendants ALBERTO CARVALHO, ILEANA DAVALOS, GEORGE  
10 MCKENNA, MONICA GARCIA, SCOTT SCHMERELSON, NICK MELVOIN,  
11 JACKIE GOLDBERG, KELLY GONEZ and TANYA ORTIZ FRANKLIN, acting  
12 through their duly authorized counsel, that Plaintiffs shall have leave to file a Second  
13 Amended Complaint to (1) correct the caption to add Plaintiff CALIFORNIA  
14 EDUCATORS FOR MEDICAL FREEDOM; (2) dismiss Plaintiff MARIEL  
15 HOWSEPIAN-RODRIGUEZ as her request for a religious exemption was granted,  
16 and (3) to update the complaint to address the evolving current situation and to  
17 narrow down fact issues and good cause appearing therefor,

18 IT IS HEREBY ORDERED that the Stipulation is GRANTED.

19 IT IS FURTHER ORDERED that Plaintiff, CALIFORNIA EDUCATORS  
20 FOR MEDICAL FREEDOM is added to the instant case.

21 IT IS FURTHER ORDERED that Plaintiff, MARIEL HOWSEPIAN-  
22 RODRIGUEZ is dismissed from the case.


23 IT IS FURTHER ORDERED that Plaintiffs' proposed Second Amended  
24 Complaint, a copy of which is attached to the Stipulation as Exhibit 1, may and  
25 hereby shall be deemed to be filed with an effective date commensurate with the  
26 entry of this Order and that the Clerk of the Court is therefore instructed to accept  
27 the Second Amended Complaint for filing in accordance herewith.

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IT is FURTHER ORDERED that Defendants' will file a response within 30 days from date the second amended complaint is deemed filed by the Court.

IT IS SO ORDERED.

DATED: March 14, 2022

  
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Dale S. Fischer  
UNITED STATES DISTRICT JUDGE