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CHLOE E. BROCKMAN

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 IN AND FOR THE COUNTY OF SAN JOAQUIN – STOCKTON BRANCH

14 CHLOE E. BROCKMAN aka CHLOE
15 COLE, an individual

16 Plaintiff,

17 v.

18 KAISER FOUNDATION HOSPITALS,
INC., a California Corporation, THE
19 PERMANENTE MEDICAL GROUP, INC.,
a California Corporation, LISA KRISTINE
20 TAYLOR, M.D., an individual, HOP
21 NGUYEN LE, M.D., an individual,
SUSANNE E. WATSON, PHD., an
22 individual, LILIT ASULYAN PSYD, an
individual, and ESTER BALDWIN, LCSW,
23 PHD, an individual, and DOES 1 through 50,
24 inclusive,

25 Defendants.

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Case No.: STK-CV-UMM-2023-0001612

**[Proposed] ORDER In SUPPORT OF
PLAINTIFF CHLOE E. BROCKMAN'S
MOTION FOR LEAVE TO AMEND
COMPLAINT TO STATE CLAIM FOR
PUNITIVE DAMAGES**

Dept.: 11B
Judge: Hon. Robert T. Waters

Action Filed: Feb. 22, 2023
Trial Date: None Set Yet

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ORDER

The motion of Plaintiff Chloe E. Brockman for an order allowing her to amend her complaint so that she may seek an award of punitive damages at trial against each of the Defendants in this action came on regularly for hearing on _____, 2024, at _____, before this Court. Robert E. Weisenburger appeared on behalf of Plaintiff Chloe E. Brockman. Defense counsel appeared on behalf of Defendants Kaiser Foundation Hospitals, Inc. et al.

After consideration of the briefs, and all other matters presented to the Court, and having listened to oral argument, the Court rules as follows:

IT IS HEREBY ORDERED that Plaintiff’s Motion for Leave to Amend Complaint to State Claim for Punitive Damages, pursuant to Cal. Code Civ. Proc. § 425.13(a), is hereby GRANTED. Within 30 days of the notice of entry of this order, Plaintiff may file her amended complaint.

IT IS SO ORDERED.

Dated: _____, 2024

HON. ROBERT T. WATERS
JUDGE OF THE SUPERIOR COURT