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10  
11 **UNITED STATES DISTRICT COURT**  
12 **FOR THE EASTERN DISTRICT OF CALIFORNIA**  
13 **SACRAMENTO DIVISION**  
14

15 **GREGORY JOHNSON, WILLIAM**  
16 **RODWELL AND EDWARD RANGEL,**

17 **Plaintiffs,**  
18 **vs.**

19 **CLAIR R. COUTURIER, JR., DAVID R.**  
20 **JOHANSON, ROBERT E. EDDY AND**  
21 **THE NOLL MANUFACTURING**  
22 **COMPANY EMPLOYEE STOCK**  
23 **OWNERSHIP PLAN AND TRUST,**

24 **Defendants,**

)  
)  
) **Case No. 2:05-cv-02046-RRB-KJM**  
)  
)  
)

)  
) **PLAINTIFFS' MOTION FOR LEAVE TO**  
) **FILE AMENDED COMPLAINT**  
)  
)  
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26 Pursuant to Rule 15 of the Federal Rules of Civil Procedure, Plaintiffs Gregory Johnson,  
27 William Rodwell and Edward Rangel hereby move for leave to file an Amended Complaint. A  
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1 Memorandum in Support and the Declaration of Anne Marie La Bue accompany this Motion. A  
2 proposed Order is also attached for the Court's convenience.

3 DATE: May 31, 2006

4 Respectfully submitted,

5  
6 /s/ Matthew Righetti

7 Matthew Righetti (SBN #121012)

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on May 31, 2006 Plaintiffs' Motion for Leave to File Amended Complaint was filed electronically. Notice of this filing will be sent to all parties listed below by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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/s/ Anne Marie La Bue  
Anne Marie La Bue (#121012)