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7 ATTORNEYS FOR PLAINTIFFS

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF ALAMEDA**

10

11 JOSIE BEAUCHAMP and REGINALD)
BETHANCOURT, individually and on)
12 behalf of themselves, the general public,)
and all others similarly situated,)

13 Plaintiffs,)

14 vs.)

15 KAISER FOUNDATION HOSPITALS, a)
California corporation, and DOES 1)
16 through 100, inclusive,)

17 Defendants.)

18 _____)

Case No. RG07307245

CLASS AND REPRESENTATIVE ACTION

**NOTICE OF JOINDER IN MOTION TO
CONSOLIDATE CLASS ACTIONS FILED
BY PLAINTIFF, LARRY HORNE, IN CASE
NO. RG06300551**

Date: August 22, 2008

Time: 10:00 a.m.

Courtroom: 20

Reservation No.: R-836031

Complaint Filed: January 22, 2007


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20 Plaintiffs, Josie Beauchamp and Reginald Bethancourt, hereby join in the motion of Plaintiff, Larry
21 Horne, to consolidate the case now pending in this Court, entitled: Larry Horne, Plaintiff, v. Kaiser
22 Foundation Hospitals, Inc., a California corporation, et al., Defendants, Case No. RG06300551
23 (hereinafter the "Horne case") with this case now pending in this Court, entitled: Josie Beauchamp and
24 Reginald Bethancourt, Plaintiffs, vs. Kaiser Foundation Hospitals, Inc., a California corporation, et al.,
25 Defendants, Case No. RG07307245 (hereinafter the "present case").

26 Plaintiffs herein, Josie Beauchamp and Reginald Bethancourt, hereby incorporate the arguments
27 of Plaintiff, Larry Horne, set forth in his motion to consolidate. Plaintiffs herein also request that the
28 Court consolidate the Horne case with the present case.

1 Dated: July 17, 2008

THIERMAN LAW FIRM
UNITED EMPLOYEES LAW GROUP, P.C.
ERIC M. EPSTEIN, A Professional Corporation

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4 By: 
5 Eric M. Epstein, Esq.
6 Attorneys for Plaintiffs
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1 PROOF OF SERVICE--CCP 1011; 1013a(3)

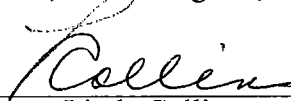
2 I am a resident of the United States and employee in the County of Los Angeles, State of
3 California, over the age of eighteen years and not a party to the within action or proceeding; my
4 business address is 1901 Avenue of the Stars, Suite 1100, Los Angeles, California 90067.

5 On July 17, 2008, I served the within document(s) described as **NOTICE OF JOINDER IN
6 MOTION TO CONSOLIDATE CLASS ACTIONS FILED BY PLAINTIFF, LARRY HORNE,
7 IN CASE NO. RG06300551** on the interested parties in this action at the address set forth below or
8 on the attached Service List:

- 9
- 10 **A. BY MAIL:** I am "readily familiar" with the firm's practice of collection and processing
11 correspondence for mailing. Under that practice it would be deposited with U.S. Postal Service
12 on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary
13 course of business. I am aware that on motion of party served, service is presumed invalid if
14 postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing
15 in affidavit.
 - 16 **B. BY FACSIMILE:** I transmitted to the interested parties by facsimile, pursuant to California Rules
17 of Court, Rule 2006. The facsimile number(s) I used is/are noted with the address of each party.
18 The facsimile machine I used complied with California Rules of Court, Rule 2004, and no error
19 was reported by the machine. Pursuant to California Rules of Court, Rule 2006(d), I caused the
20 machine to print a transmission record of the transmission, a copy of which is attached hereto.
 - 21 **C. BY PERSONAL SERVICE:** I caused such document(s) to be delivered by an employee of United
22 Express Messenger, Inc. which said delivery was confirmed by United Express Messenger, Inc.
 - 23 **D. BY OVERNIGHT DELIVERY:** I enclosed the documents in an envelope or package provided
24 by an overnight delivery carrier and placed said envelope for collection and overnight delivery at
25 a regularly utilized drop box of the overnight delivery carrier.
 - 26 **E. BY E-MAIL OR ELECTRONIC TRANSMISSION:** Based on a court order or an agreement of
27 the parties to accept service by 3-mail or electronic transmission, I caused the documents to be
28 sent to the persons at the e-mail noted with the address of each party. I did not receive, within a
reasonable time after the transmission, any electronic message or other indication that the
transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing
is true and correct. Executed on July 17, 2008, at Los Angeles, California.

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Linda Collins

SERVICE LIST

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Type of Service

Addressee

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