

1 STEPHENS FRIEDLAND LLP  
TODD G. FRIEDLAND, SBN 187022  
2 [todd@sf-lawyers.com](mailto:todd@sf-lawyers.com)  
3 LAURA A. FORBES, SBN 151071  
[laura@sf-lawyers.com](mailto:laura@sf-lawyers.com)  
4 4695 MacArthur Court, Suite 1550  
Newport Beach, CA 92660  
(949) 468-3200 Fax: (949) 468-3201

5 Attorneys for Defendants  
6 ADVANCED HOME HEALTH, INC.  
and ANGELA ALLEN  
7

8 **UNITED STATES DISTRICT COURT**  
9 **EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO**

10  
11 STELLAR HEALTH SYSTEMS, INC.  
AND NESTOR Z. LIM

12 Plaintiffs,

13 vs.

14 ADVANCED HOME HEALTH, INC.,  
15 a California Corporation authorized to  
do business in Nevada; ANGELA  
16 ALLEN, an individual; DOES 1  
through 20, inclusive and ROES 1  
17 through 20, inclusive,

18 Defendants.  
19

Case No.: 2:11-cv-0666 KJM GGH  
2:10-CV-03160-KJM-GGH

**STIPULATION TO  
CONSOLIDATE RELATED  
CASES; ORDER**

1 Plaintiffs Stellar Health Systems, Inc. and Nestor Z. Lim (collectively,  
2 “Stellar Parties”) and defendants Advanced Home Health, Inc. and Angela Allen  
3 (collectively, “Advanced Parties”) hereby submit the following Stipulation to  
4 Consolidate Related Cases:

5 WHEREAS, Advanced Home Health, Inc. previously filed an action in this  
6 district against the Stellar Parties, captioned *Advanced Home Health, Inc. v. Stellar*  
7 *Health Systems and Nestor Lim*, E.D. Cal. Case No. 2:10-CV-03160-FCD-GGH  
8 (the “Advanced action”);

9 WHEREAS, the *Advanced* action is currently pending and is assigned to the  
10 Honorable Kimberly J. Mueller;

11 WHEREAS, the Stellar Parties commenced the instant action, captioned  
12 *Stellar Health Systems, Inc. and Nestor Z. Lim v. Advanced Home Health, Inc. and*  
13 *Angela Allen* (the “Stellar action”) in state court in Clark County, Nevada;

14 WHEREAS, the Advanced Parties petitioned for removal of the *Stellar* action  
15 to U.S. District Court for the District of Nevada, and the *Stellar* action was so  
16 removed on November 18, 2010;

17 WHEREAS, on the Advanced Parties’ Motion to Dismiss for Improper  
18 Venue or, in the Alternative, to Transfer to the Eastern District of California in  
19 Accordance with Forum Selection Clause, the *Stellar* action was transferred to this  
20 Court on March 10, 2011 as Case No. 2:11-CV-00666-MCE-GGH; and

21 WHEREAS, the *Stellar* action involves substantially the same parties, similar  
22 claims, the same transaction, and similar questions of fact and law as the *Advanced*  
23 action, such that assignment of these cases to the same judge would result in a  
24 substantial savings of judicial effort.

25 ////

26 ////

27 ////

28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the Stellar Parties and the Advanced Parties, through their respective counsel of record herein, that the *Stellar* action be consolidated with the *Advanced* action and assigned to the Honorable Kimberly J. Mueller for all purposes.

DATED: March 28, 2011

TODD G. FRIEDLAND  
STEPHENS FRIEDLAND LLP

/s/ Todd G. Friedland  
By: \_\_\_\_\_  
Todd G. Friedland  
Attorneys for Defendants  
ADVANCED HOME HEALTH, INC. and  
ANGELA ALLEN

DATED: March 24, 2011

DONALD J. GREEN  
LAW OFFICES OF DONALD J. GREEN

/s/ Donald J. Green  
By: \_\_\_\_\_  
Donald J. Green  
Attorneys for Plaintiffs  
STELLAR HEALTH SYSTEMS, INC. and  
NESTOR Z. LIM

IT IS SO ORDERED.

DATED: April 1, 2011.

  
UNITED STATES DISTRICT JUDGE