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6 UNITED STATES DISTRICT COURT
7 CENTRAL DISTRICT OF CALIFORNIA

COPY

8 REZA GANJAVI,)
9 Plaintiff,)
10 v.)
11 Jeremy C. Smith, Todd Tipton,)
12 William D. Jennings, DOES 1-10,)
Defendants.)

Case Number:
CV05- 8619 DDP (JWJx)


**EX PARTE MOTION TO FILE
SECOND AMENDED COMPLAINT**

13 Pursuant to Federal Rules of Civil Procedure 15(a), Plaintiff, REZA
14 GANJAVI, respectfully prays to this Honorable Court to grant permission to
15 file the Second Amended Complaint. Since the First Amended Complaint was
16 filed, the Plaintiff has retained an attorney and as a result the Second
17 Amended Complaint more adequately presents Plaintiff's position. Significant
18 changes include

- 19 a) Replacement of Identity Theft with Forgery cause of action;
- 20 b) Update of allegations based on the latest discovery;
- 21 c) Clarification on jurisdictional issues; and
- 22 d) Removal of dismissed Defendant Douglas Carlson.

23 Plaintiff has notified the Defendants of this ex parte motion.

24 DATED: June 1, 2006
25 RESPECTFULLY SUBMITTED BY:


Frederic M. Douglas,
Attorney for REZA GANJAVI, Plaintiff