

**Exhibit A**

1  
2 UNITED STATES DISTRICT COURT  
3 FOR THE CENTRAL DISTRICT OF CALIFORNIA

4 ANGELOTTI CHIROPRACTIC,  
5 INC., et al.,

6 Plaintiffs,

7 v.

8 CHRISTINE BAKER, et al.,

9 Defendants.  
10

Case No. 8:13-cv-01139-GW-JEM

**[Proposed] Order Granting  
Plaintiffs' Motion for Preliminary  
Injunction**

11  
12 Before the Court is Plaintiffs' Motion for Preliminary Injunction (Doc. 24).  
13 The Court, having considered the arguments of the parties, **GRANTS** the motion  
14 and issues the following preliminary injunction:

15 1. Defendants are hereby enjoined and restrained from enforcing the lien  
16 activation fee provisions of SB 863, which are codified at Cal. Lab Code § 4903.06,  
17 against any workers' compensation lien holder, including Plaintiffs. Specifically, De-  
18 fendants shall not:

- 19 a. Subject any existing workers' compensation lien holder to a lien  
20 activation fee pursuant to Cal. Lab. Code. § 4903.06(a).  
21 b. Require or collect payment of any activation fee on any existing  
22 lien, electronically or otherwise, pursuant to Cal. Lab. Code §§  
23 4903.06(a)(1) and (a)(3).  
24 c. Require any lien claimant to provide proof of payment of a lien  
25 activation fee with any declaration of readiness to proceed, pursu-  
26 ant to Cal. Lab. Code § 4903.06(a)(2).  
27  
28

- 1 d. Require any lien claimant to provide proof of payment of a lien
- 2 activation fee at the time of any lien conference, pursuant to Cal.
- 3 Lab. Code § 4903.06(a)(4).
- 4 e. Dismiss any lien for failure to pay an activation fee by the time of
- 5 any lien conference, pursuant to Cal. Lab. Code § 4903.06(a)(4).
- 6 f. Dismiss any lien for which an activation fee has not been paid
- 7 prior to January 1, 2014, pursuant to Cal. Lab. Code §
- 8 4903.06(a)(5).
- 9 g. Enforce any issued emergency regulations or any final regulation
- 10 implementing any provision of Cal. Lab. Code § 4903.06.
- 11 h. Take any other action, whether or not listed above, intended to
- 12 effectuate or enforce any provision of Cal. Lab. Code § 4903.06.

13 2. This injunction shall take effect seven days from the date of this order.

14 3. This injunction shall apply to all Defendants as well as any of Defend-  
15 ants’ officers, agents, servants, employees and attorneys. This injunction shall further  
16 apply to any other persons who are in active concert or participation with Defendants  
17 or Defendants’ officers, agents, servants, employees and attorneys. Fed. R. Civ. P.  
18 65(d)(2).

19 4. The Court’s reasons for issuing this injunction are contained in a forth-  
20 coming opinion, as well in the transcripts of proceedings held on November 4 and 7,  
21 2013. Fed. R. Civ. P. 65 (d)(1)(A).

22 5. This injunction shall be in effect until further order of the Court.

23  
24  
25 Dated: November \_\_\_\_, 2013

---

26 Hon. George H. Wu, U.S.D.J.  
27 United States District Court  
28 Central District of California  
Los Angeles Division