

1 ANKUR MANDHANIA (State Bar No. 302373)
Ankur.Mandhanian@mta.com
2 MUNGER, TOLLES & OLSON LLP
560 Mission Street
3 27th Floor
San Francisco, California 94105
4 Telephone: (415) 512-4000
Facsimile: (415) 512-4077

5 Attorney for Amicus Curiae American Hospital
6 Association

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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SANTA CLARA

10 STANFORD HEALTH CARE; Sutter Bay
11 Medical Foundation, a California nonprofit
public benefit corporation, d/b/a PALO
12 ALTO MEDICAL FOUNDATION for
Health Care, Research, and Education;
13 CALIFORNIA HOSPITAL ASSOCIATION;
and NORMAN W. RIZK, M.D.,

14 Petitioners,

15 vs.

16 BETH MINOR, in her official capacity as the
17 Palo Alto City Clerk, and CITY OF PALO
ALTO,

18 Respondents.

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20 ELI AKERIB,

21 Real Party in Interest.
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Case No. 18CV330068

**APPLICATION FOR LEAVE TO FILE
AMICUS CURIAE BRIEF**

Judge: Hon. James L. Stoelker
Date: July 27, 2018
Time: 9:30 a.m.
Dept.: 13

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APPLICATION

The American Hospital Association (AHA) requests leave to file the accompanying *amicus curiae* brief in support of Petitioners’ request that this Court remove the Palo Alto Accountable and Affordable Care Initiative from Palo Alto’s November 6, 2018 ballot.

The AHA represents more than 5,000 hospitals, health care systems, and other health care organizations, plus 43,000 individual members. AHA members are committed to improving the health of communities they serve and to helping ensure that care is available to and affordable for all Americans. AHA educates its members on health care issues and advocates to ensure that their perspectives are considered in formulating health policy.

Because of its national perspective, the AHA has a deep understanding of the history of price controls on hospitals. It respectfully submits that this history, which is the subject of its *amicus* brief, can inform this Court’s decision with respect to Palo Alto’s similar ballot initiative.

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DATED: July 13, 2018

MUNGER, TOLLES & OLSON LLP

By: /s/ Ankur Mandhania
 ANKUR MANDHANIA

Attorney for Amicus Curiae American Hospital
Association