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19 Attorneys for Defendant, CHILDREN'S HOSPITAL CENTRAL CALIFORNIA, INC.

20 **UNITED STATES DISTRICT COURT**
 21 **EASTERN DISTRICT OF CALIFORNIA**

22 PERINATAL MEDICAL GROUP, INC.,
 23 KRISHNAKUMAR RAJANI, M.D., and
 24 STEPHEN ELLIOT, M.D.

25 Plaintiffs,

26 v.

27 CHILDREN'S HOSPITAL CENTRAL
 28 CALIFORNIA, INC., a California
 Corporation,

Defendant.

Case No.1:09-CV-01273 LJO SMS

**STIPULATION CONCERNING
 DOCUMENTS MARKED
 CONFIDENTIAL/ATTORNEY'S
 EYES ONLY AND ORDER
 THEREON**

STIPULATION

1. The parties have entered into a Stipulated Protective Order that was filed after signature by this Court on January 11, 2010.

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1 2. In connection with discovery in this case, the Plaintiff has produced to
2 Defendant Children’s Hospital Central California certain documents marked “PMG0334-
3 1339”, all of which have been marked “attorney’s eyes only.”

4 3. Defendant Children’s Hospital Central California disputes this designation.

5 4. In an attempt to resolve this dispute informally, the parties agreed that
6 compilations and summaries relating to those documents prepared either by counsel or others
7 retained by counsel (so long as not employed by Defendant Children’s Hospital Central
8 California or other defendants), could be shared with the Hospital’s CEO, CFO Todd
9 Suntrapak, in-house counsel, Mr. Richard Wolf, and insurance representatives, so long as those
10 persons agreed that such information would not be shared with others unless the persons are
11 those who are identified in Section 7 of the Stipulated Protective Order.

12 5. The parties desire to memorialize that agreement for purposes of the actual
13 litigation to permit counsel for Defendant Children’s Hospital Central California to share
14 compilations and summaries from those documents but not the actual documents themselves,
15 with the personnel identified in paragraph 4 above, the Hospital’s in-house counsel, Mr.
16 Richard Wolf, and insurance representatives, so long as those persons agree that information
17 will not otherwise be disclosed to anyone other than the persons referenced in Section 7 of the
18 Stipulated Protective Order.

19 6. The parties have agreed that the time period to challenge this designation shall
20 be waived as it relates to these documents and that the provisions of paragraph 5 of the
21 Stipulated Protective Order shall not apply to this designation. Defendant Children’s Hospital
22 Central California shall have the opportunity at any time in the future during the course of this
23 case to challenge this designation if it so desires, including seeking the ability to share certain
24 documents with the client or other persons.

25 DATED: 3/18/10

26 By: /s/ WILLIAM C. HAHESEY
27 William C. Haesy,
28 Attorneys for Defendant,
CHILDREN’S HOSPITAL CENTRAL
CALIFORNIA

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DATED: 3/19/10

CHRISTENSEN & AUER

By: /s/ STEPHEN AUER
Stephen Auer,
Attorneys for Plaintiffs

DATED: 3/19/10

DAVIS WRIGHT TREMAINE, LLP

By: /s/ WILLIAM C. HAHEYSY for
Douglas Ross
Attorneys for Defendant,
CHILDREN'S HOSPITAL CENTRAL
CALIFORNIA

