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COUNTY OF MADERA and
MICHAEL KEITZ
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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 KAREN MITCHELL and TONI LINDSEY,
11 Plaintiffs,
12 v.
13 COUNTY OF MADERA, and MICHAEL
14 KEITZ,
15 Defendants.

Case No. 1:10-cv-01405-LJO-DLB

**STIPULATION AND ORDER RE
DISCOVERY AND ADMISSION OF
EVIDENCE**

1 IT IS HEREBY STIPULATED by and between the above-entitled parties through their
2 attorneys of record that:

3 1. Dan Rowley will not be subject to any form of written discovery or deposition in
4 the above-entitled matter, nor will he testify at trial on behalf of any of the parties to this
5 litigation.

6 2. Defendants will not assert the fact of Dan Rowley's investigation, his investigative
7 file or his subsequent report as a defense to any of Plaintiffs' claims, including Plaintiff's claim
8 under Government Code 12940(h).

9 Upon execution of this Stipulation Plaintiffs agree to withdraw all discovery associated
10 with Dan Rowley, including the deposition set for March 23, 2011.

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12 IT IS SO STIPULATED.

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14 Dated: March 21, 2011

COTA COLE LLP

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16 By: /s/ Carolyn J. Frank

Dennis M. Cota
Carolyn J. Frank
James D. Maynard
Attorneys for Defendants
COUNTY OF MADERA and MICHAEL
KEITZ

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20 Dated: March 22, 2011

PENNER, BRADLEY & SIMONIAN

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22 By: /s/ Peter S. Bradley

Peter S. Bradley
Attorneys for Plaintiffs
KAREN MITCHELL and TONI
LINDSEY

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25 IT IS SO ORDERED.

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27 Dated: March 28, 2011

/s/ Dennis L. Beck
UNITED STATES MAGISTRATE JUDGE

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