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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 MIGUEL A. GONZALEZ-CHAVEZ,) **Case No. 1:12-CV-02053-JLT-GSA**
12)
13 Plaintiff,) **PRETRIAL STIPULATIONS AND ORDER**
14)
15 vs.) **(Docs. 45, 48)**
16)
17 CITY OF BAKERSFIELD, CHRISTOPHER)
18 MESSICK, DEAN BARTHELMES, and DOES 1)
19 to 100, Inclusive,)
20 Defendants.)
21)
22)
23)
24)
25)
26)
27)
28)

21 Pursuant to the Court's Order and after a good faith meet and confer between the parties,
22 the following stipulations are offered and agreed upon:

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24
25 1. There will be no comment or mention by Defense Counsel, or Defense witness Dr. Donald
26 Huene regarding Huene's opinion that based on the behavior of the plaintiff at the Independent
27 Medical Examination, Mr. Huene understood why the officers may have, and/or did used force
28 on Plaintiff.

1 2. There will be no comment, reference to or evidence of any previous criminal convictions
2 pertaining to Plaintiff.

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4 3. That all witnesses will be informed of the stipulations and instructed to adhere to this
5 agreement.

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7 IT IS SO STIPULATED.

8
9 Respectfully submitted,

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11 Dated: January 7, 2015

RODRIGUEZ & ASSOCIATES

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14 _____
15 Martha J. Rossiter
16 Attorney for Plaintiff

17 Dated: January 7, 2015

CITY OF BAKERSFIELD

18
19
20 _____
21 Michael Marderosian
22 Attorney for Defendants

23 IT IS SO ORDERED.

24 Dated: January 8, 2015

25 /s/ Jennifer L. Thurston
26 UNITED STATES MAGISTRATE JUDGE
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