



1 **SUBJECT PROPERTY:** Strip mall located at or about 514 Finley Drive, Taft, California.  
2 **READILY ACHIEVABLE:** Shall have the same definition as that found at 42 U.S.C. §  
3 12181(9).  
4 **BARRIER:** Any architectural or configuration element of the subject  
5 property that does not comply with the technical provisions  
6 found in the Americans With Disabilities Act Accessibility  
7 Guidelines and/or Title 24 of the California Code of  
8 Regulations, and which is identified in the Plaintiff's complaint.  
9 **VAN ACCESSIBLE PARKING**  
10 **SPACE:** A striped and reserved handicap parking space that has a  
11 separate access aisle measuring 96 inches in width.

12 **PLAINTIFF DEBRA ANGLIN AND DEFENDANT HIFDHUULAH A. ALROWHANY,**  
13 **BY AND THROUGH THEIR ATTORNEYS OF RECORD, HEREBY STIPULATE:**

14 **WHEREAS** Plaintiff has propounded written discovery to assist him in determining the  
15 ability of the Stipulating Defendants to undergo "readily achievable" barrier removal and to support  
16 Plaintiff's damages assessment; and

17 **WHEREAS** such discovery information is of a personal and confidential nature and,  
18 therefore, the Stipulating Defendants have a legitimate concern about unnecessarily producing such  
19 information;

20 The Plaintiff and the Stipulating Defendants enter into the following stipulation:  
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24 **Plaintiff:** Plaintiff will currently forbear from propounding any discovery that seeks information  
25 concerning the financial status, ability, or wherewithal of the Stipulating Defendants. Plaintiff also  
26 withdraws all discovery already propounded concerning this information.  
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Dated: April 6, 2015

Lewis Brisbois Bisgaard & Smith LLP

By: /s/ Shane Singh

As authorized on 4/6/15 (original on file with counsel)

SHANE SINGH

Attorney for Defendants

**ORDER**

IT IS SO ORDERED.

Dated: April 7, 2015

/s/ Jennifer L. Thurston  
UNITED STATES MAGISTRATE JUDGE