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16 UNITED STATES DISTRICT COURT
17 EASTERN DISTRICT OF CALIFORNIA

18) Case No. 1:14-CV-01873-JLT
19)
20) **JOINT STIPULATION**
21) **REGARDING EVIDENCE;**
22) **[PROPOSED] ORDER THEREON**
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24) **(Doc. 45)**
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Pursuant to this Court's Pretrial Conference Order, the parties met and conferred on June 17, 2016, regarding anticipated motions in limine. Pursuant to that conference, it was agreed that:

1. There will be no reference to, evidence of, or argument regarding economic damages including, but not limited to, medical expenses, both past and future, and wage loss, both past and future.
2. There will be no reference to, evidence of, or argument regarding the Plaintiff's DUI.

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3. Donald R. Huene, M.D., will not testify regarding his impressions of, or otherwise comment on, Plaintiff’s psychiatric condition and/or Plaintiff’s ability or inability to hear.

4. There will be no reference to, evidence of, or argument that a verdict in favor of the Plaintiff would come from tax payer dollars.

5. There will be no reference to, evidence of, or argument regarding the “golden rule”.

In regard to the above referenced areas, the parties agree:

1. Not to mention, refer to, or attempt to convey to the jury in any manner, either directly or indirectly, any of the facts mentioned in the above referenced area; and

2. Warn and caution each witness to strictly follow said instructions.

Dated: June 21, 2016

RODRIGUEZ & ASSOCIATES

/s/ John Kawai

By: _____
John Kawai,
Attorneys for Plaintiff

Dated: June 21, 2016

MARDEROSIAN & COHEN

/s/ Michael G. Marderosian

By: _____
Michael G. Marderosian,
Attorneys for Defendants
above-named.

1 **ORDER**

2 Pursuant to the stipulation of the parties, it is hereby ordered that at the time of trial:

- 3 1. There will be no reference to, evidence of, or argument regarding economic damages
4 including, but not limited to, medical expenses, both past and future, and wage loss, both past and future.
- 5 2. There will be no reference to, evidence of, or argument regarding the Plaintiff's DUI.
- 6 3. Donald R. Huene, M.D., will not testify regarding his impressions of, or otherwise comment
7 on, Plaintiff's psychiatric condition and/or Plaintiff's ability or inability to hear.
- 8 4. There will be no reference to, evidence of, or argument that a verdict in favor of the Plaintiff
9 would come from tax payer dollars.
- 10 5. There will be no reference to, evidence of, or argument regarding the "golden rule".

11 In regard to the above referenced areas, the parties shall:

- 12 1. Not mention, refer to, or attempt to convey to the jury in any manner, either directly or
13 indirectly, any of the facts mentioned in the above referenced area; and
- 14 2. Warn and caution each witness to strictly follow said instructions.

15 IT IS SO ORDERED.

16 Dated: June 21, 2016

17 /s/ Jennifer L. Thurston
18 UNITED STATES MAGISTRATE JUDGE

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