

CHAIN | COHN | STILES

Matthew C. Clark, Esq. (SBN 218784) | mclark@chainlaw.com  
Neil K. Gehlawat, Esq. (SBN 289388) | ngehlawat@chainlaw.com  
1731 Chester Avenue  
Bakersfield, CA 93301  
Telephone: (661) 323-4000  
Facsimile: (661) 324-1352

LAW OFFICES OF DALE K. GALIPO

Dale K. Galipo, Esq. (SBN 144074) | dalekgalipo@yahoo.com  
21800 Burbank Boulevard, Suite 310  
Woodland Hills, CA 91367  
Telephone: (818) 347-3333  
Facsimile: (818) 347-4118

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

D.G., a minor, by and through his guardian ad litem, Denise Bonilla, individually and as successor-in-interest to David Garcia, deceased; D.E.G., a minor, by and through her guardian ad litem, Denise Bonilla, individually and as successor-in-interest to David Garcia, deceased; G.D., a minor, by and through her guardian ad litem, Denise Bonilla, individually and as successor-in-interest to David Garcia, deceased; RAMONA RAMIREZ NUNEZ, individually,

Plaintiffs,

v.

COUNTY OF KERN; DOES 1 through 10,

Defendants.

CASE NO. 1:15-CV-00760-JAM-JLT

**STIPULATION TO SEAL JOINT  
PRETRIAL STATEMENT [DOC. 57 &  
57-1]; ORDER THEREON**

WHEREAS, the parties' Joint Pretrial Statement [Doc. 57 and 57-1] was not in compliance with FRCP 5.2 or Local Rule 140 in that the names of the minor Plaintiffs and their dates of birth were contained in the document.

Therefore, the parties, by and through their attorneys of record, stipulate that the Joint Pretrial Statement [Doc. No. 57 and 57-1] be sealed by the Court, and an updated version of the Joint Pretrial Statement be filed in compliance with FRCP 5.2 and Local Rule 140.

DATED: October 26, 2016

CHAIN | COHN | STILES

*/s/ Neil K. Gehlawat*

BY: \_\_\_\_\_

Matthew C. Clark  
Neil K. Gehlawat  
Attorney for Plaintiff

DATED: October 26, 2016

LAW OFFICES OF DALE K. GALIPO

*/s/ Dale K. Galipo*

BY: \_\_\_\_\_

Dale K. Galipo  
Attorney for Plaintiff

DATED: October 26, 2016

COUNTY COUNSEL, COUNTY OF KERN

*/s/ Andrew Thomson*

BY: \_\_\_\_\_

Andrew Thomson  
Attorney for Defendant, COUNTY OF  
KERN

**ORDER**

**IT IS HEREBY ORDERED** that Document No. 57 and 57-1 is hereby sealed. The parties are ordered to file an updated version of the Joint Pretrial Statement that is in compliance with FRCP 5.2 and Local Rule 140.

DATED: 10/26/2016

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

*/s/ John A. Mendez*  
\_\_\_\_\_  
JOHN A. MENDEZ, United State District Judge