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14 IN THE UNITED STATES DISTRICT COURT
15 EASTERN DISTRICT OF CALIFORNIA
16

17 ISSAM ELIE KNICKERBOCKER,
18 Plaintiff,
19 v.

20 UNITED STATES OF AMERICA; UNITED
21 STATES DEPARTMENT OF INTERIOR,
NATIONAL PARK SERVICE, DEATH
22 VALLEY NATIONAL PARK; NICOLE
GRUVER; BRYAN DREW; and DOES 3–25,
23 Defendants.

Case No. 1:16-cv-01811-DAD-JLT

STIPULATION AND PROPOSED ORDER
RE: RULE 35 PHYSICAL EXAMINATION
(Doc. 69)

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1 IT IS HEREBY STIPULATED, by and between the parties through their undersigned counsel,
2 as follows:

3 1. Plaintiff Issam Elie Knickerbocker will undergo a physical examination conducted by
4 Dr. Geoffrey M. Miller, M.D., at **14516 Hawthorne Boulevard, Lawndale, California, Zip Code**
5 **90260**. The examination will occur on **February 6, 2019, at 12:30 p.m.**

6 2. The examination will take approximately one hour to complete and will comprise a
7 standard orthopedic examination addressing the spine and extremities and will consist of four parts—
8 inspection, palpation, range-of-motion, and a neurological exam. The neurological exam will consist of
9 sensory, motor, and reflex testing.

10 3. Plaintiff shall answer all inquiries made by Dr. Miller so that he can evaluate the nature,
11 extent, and cause of Plaintiff's condition as well as his prognosis. Dr. Miller's inquiries shall be
12 reasonably calculated to elicit information about the nature, extent, cause, and prognosis of Plaintiff's
13 injuries at issue in this case.

14 4. No observers shall attend the examination. The cost of the examination shall be borne by
15 Defendant United States of America.

16 5. Dr. Miller will prepare a report concerning the examination and a copy will be provided
17 to Plaintiff on or before **February 15, 2019**, without the need for a formal demand.

18 Dated: December 19, 2018

KNICKERBOCKER LAW FIRM

19 By: /s/ Richard L. Knickerbocker (authorized on 12/19/2018)
20 Richard L. Knickerbocker
Attorney for Plaintiff

21 Dated: December 19, 2018

McGREGOR W. SCOTT
United States Attorney

22 By: /s/ Joseph B. Frueh
23 JOSEPH B. FRUEH
24 Assistant United States Attorney
Attorneys for Defendants

25 IT IS SO ORDERED.

26 Dated: **December 20, 2018**

/s/ Jennifer L. Thurston
27 UNITED STATES MAGISTRATE JUDGE