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19 Attorneys for: Plaintiff TATYANA HARGROVE

20 UNITED STATES DISTRICT COURT
21 EASTERN DISTRICT OF CALIFORNIA

22 TATYANA HARGROVE,) Case No. 1:17-CV-01743-JLT
23)
24 Plaintiff,) **STIPULATION AND [PROPOSED]**
) **ORDER RE DEFENDANTS' MOTIONS**
25 vs.) **IN LIMINE NOS. 1, 5, 8, 10, 12, 13,**
) **14, 17 AND 19**
26 CITY OF BAKERSFIELD, et al.) (Doc. 55)
27)
28 Defendants.)
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1 11. Dr. Pangarkar is not going to testify that Ms. Hargrove needs any sort of
2 neuropsychological evaluation.

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4 Dated: September 25, 2019

THE LAW OFFICE OF THOMAS C. SEABAUGH

/s/ Thomas C. Seabaugh

6 By: _____
7 Thomas C. Seabaugh,
8 Attorneys for Plaintiff

9 Dated: September 25, 2019

ALDERLAW PC

/s/ Neil Gehlawat

11 By: _____
12 Neil Gehlawat,
13 Attorneys for Plaintiff

14 Dated: September 25, 2019

MARDEROSIAN & COHEN

/s/ Michael G. Marderosian

16 By: _____
17 Michael G. Marderosian,
18 Attorneys for Defendants
19 above-named.

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1 **ORDER**

2 **IT IS SO ORDERED THAT:**

3 1. The Parties agree that no Party will introduce, reference, or allude to the fact that
4 Christopher Moore is no longer paired with his K9 partner;

5 2. The Parties agree that no Party will introduce, reference, make statements to the effect or
6 allude to the Bakersfield Police Department or its officers as the “deadliest police force in America”;

7 3. The Parties agree that no Party will introduce, reference, or allude to the recent report
8 issued by the ACLU;

9 4. The Parties agree that no Party will introduce, reference, or allude to the 2004 Department
10 of Justice letter;

11 5. The Parties agree that no Party will introduce, reference, or argue that either the
12 Department of Justice, the Federal Bureau of Investigation, or any other agency is investigating the City
13 of Bakersfield Police Department;

14 6. Non-party witnesses will be excluded from the Courtroom;

15 7. No party will make any “Golden Rule Argument”;

16 8. The Parties agree that no Party will introduce, reference, or allude to the surveillance video
17 of the incident at the Grocery Outlet store;

18 9. The parties agree that no party will introduce, reference, or allude to the recent
19 arrest/placement on administrative leave of Evan Demestihias;

20 10. In the event a party feels that the door has been opened with regard to any of the above
21 categories, that party will raise the issue outside of the presence of the jury and seek the Court’s permission
22 to depart from this Order;

23 11. Based on the foregoing, it is unnecessary for the Court to rule on Defendants’ Motions in
24 Limine Nos. 1, 5, 8, 10, 12, 13, 14, 17 and 19.

25 12. The Plaintiff waives any claim to past medical expenses.

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1 13. Dr. Pangarkar will not testify that the Plaintiff needs any sort of neuro-psychological
2 evaluation.

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4 IT IS SO ORDERED.

5 Dated: September 25, 2019

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE

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