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Attorneys for Plaintiffs
PATRICK AYMAR and SHERELLE MELTON

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

PATRICK AYMAR,
Plaintiff,
v.
PAUL R. STASSINOS, ET AL.,
Defendants.

Case No. 2:07-CV-02561 JAM GGH
**Stipulation Regarding Motion to Compel
and Order**

SHERELLE MELTON,
Plaintiff,
v.
PAUL R. STASSINOS, ET AL.,
Defendants.

Case No. 2:07-CV-02799 JAM GGH
RELATED CASES
U.S. DISTRICT COURT
501 I Street, Courtroom #24, 8th Floor
Sacramento, CA 95814
Date: February 5, 2009
Time: 10:00 a.m.
HON. GREG HOLLOWS

1
2 Plaintiffs filed a Motion to Compel which was set to be heard on February 5, 2009.

3 Defendants shall produce the below information by Friday, February 6, 2009 (Defendants shall
4 provide available deposition dates for Stassinis by February 6, 2009, with the deposition to
5 occur after that date). The parties hereby stipulate to the following:
6

- 7 1) **Financial Condition and Net Worth**: The parties shall enter into a Stipulated Protective
8 Order. Defendants shall produce all responsive documents relating to financial condition
9 and net worth for the past three years. Defendants shall supplement their responses to
10 Interrogatory #12 (Identify the net worth including the assets and liabilities of
11 Defendant). Paul Stassinis will testify at deposition regarding his financial condition and
12 net worth.
- 13 2) **Personnel files**: Defendants shall produce the personnel files of Alex Davido and Adam
14 Perry (excluding items such as medical information, sick leave, etc) for the past three
15 years. The parties understand the documents sought are disciplinary records,
16 performance evaluations, Fair Debt Collection Practices Act tests, and
17 salary/compensation information, etc.).
- 18 3) **Consumer complaints**: Defendants shall inform Plaintiffs by Friday, January 30, 2009,
19 whether there are any responsive documents, and whether such will be voluntarily
20 produced.
- 21 4) **Telephone records/billing records**: Defendants shall produce all responsive documents,
22 at first redacted to only reveal the phone numbers relating to Plaintiffs' accounts. In the
23 event Plaintiff believes the documents are not redacted properly the parties will meet and
24 confer regarding whether other documents need to be produced.
25

18 Date: 1/27/09

19 Respectfully,

20 /s/Candace Pagliero
21 _____

22 Candace Pagliero

23 /s/Darrell Spence
24 _____

24 Darrell Spence

25 /s/Ronald Wilcox

Ronald Wilcox

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ORDER

The stipulation of the parties is hereby adopted. The Motion to Compel (Docket # 40 in case # 2561) is vacated without prejudice to its renewal, if necessary.

IT IS SO ORDERED.

Date: January 29, 2009

/s/ Gregory G. Hollows
HON. GREGORY HOLLOWS
U.S. MAGISTRATE JUDGE