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Attorneys for Defendants
Todd and Martinez

16 UNITED STATES DISTRICT COURT
17 EASTERN DISTRICT OF CALIFORNIA
18 SACRAMENTO DIVISION
19

20 RONNIE E. BARRON,

21
22 Plaintiff,

23 v.

24 M. MARTEL, *et al.*,

25
26 Defendants.
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Case No. 2:10-CV-01567-WBS-EFB (TEMP)

**STIPULATION REGARDING
ADMISSIBILITY OF MEDICAL
RECORDS**

Complaint Filed: June 22, 2010

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STIPULATION REGARDING ADMISSIBILITY OF MEDICAL RECORDS

WHEREAS, Plaintiff Ronnie E. Barron (“Plaintiff”) and Defendants Kelly Martinez and K. Todd (“Defendants”) have collected and exchanged the following bates-stamped medical records maintained by:

- (1) California Department of Corrections and Rehabilitation (MR 00001 – MR 02083)
- (2) Doctors Hospital of Manteca ([Barron] 001 – [Barron] 040)
- (3) UC Davis Medical Center (BAR00001 – BAR01019).

WHEREAS, Plaintiff and Defendants stipulate to the authenticity of these records subject to the terms and conditions set forth below:

NOW THEREFORE, the undersigned parties hereto stipulate and agree as follows:

- (1) That Plaintiff and Defendants stipulate as to the authenticity of copies of these records. The parties hereto waive any objection(s) to the admissibility of these records on the ground that they are not authentic;
- (2) That such records, except for any statements written by Plaintiff, constitute records of a regularly conducted activity within the meaning of Federal Rule of Evidence 803(6). The parties hereto waive any objection(s) to the admissibility of such documents on the ground that they do not meet the requirements of Federal rule of Evidence 803(6).
- (3) That by executing this Stipulation, neither Plaintiff nor Defendants waive any other objections they may have to the admissibility of these documents, or statements contained therein.

Dated: January 20, 2016

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

/s/ Alicia J. Donahue
Alicia J. Donahue
Amir Nassihi
Andrew L. Chang

Attorneys for Plaintiff
Ronnie E. Barron

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Attorney General of California
CHRISTOPHER J. BECKER
Supervising Deputy Attorney General

/s/ Jon S. Allin

JON S. ALLIN
Deputy Attorney General
Attorneys for Defendants Todd and Martinez

IT IS SO ORDERED.

Dated: January 22, 2016



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE