

1 WARREN H. NELSON, JR., # 104744  
2 A PROFESSIONAL CORPORATION  
3 6161 El Cajon Blvd., # 273  
4 San Diego, CA 92115  
5 Telephone: 619 269 4212  
6 Facsimile: 619 501 7948  
7 Email: [nelson@rolando.sdcoxmail.com](mailto:nelson@rolando.sdcoxmail.com)

8 Attorney for Defendant  
9 Standard Insurance Company

10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF CALIFORNIA

12 KATHLEEN GARCIA,  
13 Plaintiff,

14 vs.

15 STANDARD INSURANCE  
16 COMPANY, et al.

17 Defendants.

18 Case No.: 2:13-cv-02164-WBS-CKD  
19 STIPULATION AND [PROPOSED]  
20 ORDER TO ALLOW MANUAL  
21 SUBMISSION OF MATTER ON DVD

22 No hearing set or required.

23 Before the Honorable William B.  
24 Shubb, Judge

25 Plaintiff Kathleen Garcia and Defendant Standard Insurance Company  
26 (“Standard”) stipulate that Standard may manually submit to the Court:

- 27 1. On a single DVD, the videotape of the Deposition of Kathleen Garcia taken  
28 on September 29, 2014, as prepared by Barkley Reporters.
2. On a single DVD, surveillance videotape of Kathleen Garcia taken on  
December 23, 26, 2014, and January 9, 2015. Garcia stipulates to this  
based on the representations of Standard’s counsel that the DVD is an exact,  
true and correct copy of the video surveillance produced by Standard’s  
counsel on a thumb drive to Garcia’s counsel on or about January 13, 2015.

1 3. By stipulating to manual submission of the foregoing two DVDs, Garcia  
2 does not admit that the materials are authentic, admissible for any purpose  
3 or waive any objection to the Court's consideration of these materials for  
4 any purpose asserted by Standard or otherwise. Garcia does nothing more  
5 than agree that the two DVDs may be submitted manually.

6 **IT IS SO STIPULATED.**

7 Dated: February 19, 2015

8 /s/ Warren H. Nelson, Jr.  
9 **WARREN H. NELSON, JR.**  
10 **A PROFESSIONAL CORPORATION**  
11 **6161 El Cajon Boulevard, # 273**  
12 **San Diego, CA 92115**

13 **Attorney for Defendant**  
14 **STANDARD INSURANCE COMPANY**

15 **IT IS SO STIPULATED.**

16 Dated: February 19, 2015

17 /s/ Dan Rainsbury  
18 **Dan Rainsbury**

19 **DAVID ALLEN & ASSOCIATES**  
20 **5230 Folsom Boulevard**  
21 **Sacramento, CA 95819**

22 **Attorneys for Plaintiff**  
23 **KATHLEEN GARCIA**

24 **IT IS SO ORDERED.**

25 Dated: February 24, 2015

26 

27 **WILLIAM B. SHUBB**  
28 **UNITED STATES DISTRICT JUDGE**