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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

26 JAMES JOSHUA MAYFIELD; JAMES  
 ALLISON MAYFIELD, JR.; and TERRI  
 27 MAYFIELD,  
 28 Plaintiffs.

Case No. 2:13-CV-02499-JAM-AC

**ASSIGNED TO THE HONORABLE JOHN A. MENDEZ – COURTROOM 6**

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v.

IVAN OROZCO, in his individual capacity;  
SHERIFF SCOTT JONES, in his individual  
and official capacity; RICK PATTISON, in his  
individual and official capacity, COUNTY OF  
SACRAMENTO; UNIVERSITY OF  
CALIFORNIA DAVIS HEALTH SYSTEM;  
and DR. GREGORY SOKOLOV, in his  
individual capacity; DR. ROBERT HALES, in  
his individual capacity, and DOES 1-5,

Defendants.

**STIPULATION RE IME OF PLAINTIFF  
JAMES JOSHUA MAYFIELD**

Complaint Filed: December 3, 2013  
1st Amended Complaint Filed: March 26, 2014  
2<sup>nd</sup> Amended Complaint Filed: March 19, 2015  
3<sup>rd</sup> Amended Complaint Filed: June 22, 2015  
4<sup>th</sup> Amended Complaint Filed: June 20, 2016  
Trial Date: May 17, 2017

**IT IS HEREBY STIPULATED BY THE PARTIES TO CASE NO. 2:13-CV-02499-JAM-  
AC AS FOLLOWS:**

1. The defense will conduct one joint independent medical examination (“IME”) of Plaintiff JAMES JOSHUA MAYFIELD (“Plaintiff”) pursuant to Fed. R. Civ. Proc. 35;
2. The IME will be completed on August 25, 2016 at Plaintiff’s home;
3. The IME will last no more than 3 hours;
4. Only one physical examiner, Dr. Thomas Hedge (“Dr. Hedge”), and one life care planner, Stacy Helvin (“Ms. Helvin”), will be present at the examination for the defense;
5. Plaintiffs will also have one life care planner, Dr. Walter Harrell (“Dr. Harrell”), and Dr. Juan Latorre, Physical Medicine and Rehabilitation (“Dr. Latorre”), present during the IME;
6. Ms. Helvin, Dr. Harrell and Dr. Latorre will remain silent during the examination by Dr. Hedge;
7. Given that Plaintiffs will have an attorney present during the IME, defendants will also have one attorney present during the IME;
8. CVs of Dr. Hedge, Ms. Helvin, Dr. Harrell and Dr. Latorre will be exchanged by the parties upon execution of this Stipulation.
9. Pursuant to Federal Rule of Civil Procedure Rule 35(b), Defendants agree to produce the IME report of Dr. Hedge, as well Ms. Helvin’s report of what she observed during the IME by September 22, 2016. Plaintiffs likewise agree to produce the reports of Drs. Harrell and Latorre on



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**ATTESTATION REGARDING SIGNATURES**

I, Bianca S. Watts, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filings content and have authorize the filing.

DATED: July 13, 2016

\_\_\_\_\_  
/s/ Bianca S. Watts  
Bianca S. Watts

