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8 Attorneys for Defendant,
OFFICER D. BUNCH

9
10 **IN THE UNITED STATES DISTRICT COURT**
11 **IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA**

12
13 BENJAMIN STROMAN)

CASE NO. 2:14-cv-00524 WBS CKD

14 Plaintiff,)

15 vs.)

**STIPULATION and ~~PROPOSED~~ ORDER
REGARDING DEPOSITION OF INMATE
WITNESS DARRYL GEYER**

16 VALLEY STATE PRISON WARDEN)

17 RON DAVIS IN HIS)

18 PERSONAL/INDIVIDUAL)

19 CAPACITY, CDCR CORRECTIONS)

20 OFFICER S. CLEMENT IN HIS)

21 PERSONAL/INDIVIDUAL)

22 CAPACITY, CDCR CORRECTIONS)

23 OFFICER R. FLEMING IN HIS)

PERSONAL/INDIVIDUAL)

CAPACITY, CDCR CORRECTIONS)

OFFICER D. BUNCH IN HIS)

PERSONAL/INDIVIDUAL)

CAPACITY, and DOES 1 - 100)

Defendants.)

24 **TO THE COURT, TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

25 Plaintiff Benjamin Stroman ("Plaintiff") and Defendants Bunch, Clement, and Davis by
26 and through their undersigned counsel, hereby stipulate as follows:

27 That good cause exists to depose incarcerated witnesses Darryl Geyer.

28 Specifically, the parties stipulate that good cause exists to depose the aforementioned

1 inmate witness who was identified during the course of plaintiff's deposition on April 28, 2015
2 as having not only witnessed the incident of March 10, 2013 at issue in this case, but who also
3 has authored writings and has provided recorded statements regarding the incident.

4 Hence, the parties stipulate that it is necessary to take the depositions of incarcerated
5 prisoner Darryl Geyer, CDC# P-57424 on June 16, 2015 at 9:00 a.m. at Valley State Prison in
6 Chowchilla, California, pursuant to F.R.C.P. 30(a)(2)(B).

7 **IT IS SO STIPULATED.**

8
9 Dated: May 21, 2015

RIVERA & ASSOCIATES

10 /s/ *Jonathan B. Paul*

11 _____
Jonathan B. Paul, Esq.
Attorney for Defendant Bunch

12
13 Dated: May 22, 2015

LAW OFFICES OF BENJAMIN A. WILLIAMS

14 /s/ *Benjamin A. Williams* (as authorized on 5/22/15)

15 _____
Benjamin A. Williams, Esq.
Attorney for Plaintiff

16
17 Dated: May 21, 2015

LAW OFFICES OF STEVEN A. GERINGER

18 /s/ *Steven A. Geringer* (as authorized on 5/21/15)

19 _____
Steven A. Geringer, Esq.
Attorney for Defendant Clement

20
21 Dated: May 21, 2015

CALIFORNIA OFFICE OF ATTORNEY GENERAL

22 /s/ *Tiffany Hixson* (as authorized on 5/21/15)

23 _____
Tiffany Hixson, Esq.
Attorney for Defendants R. Davis

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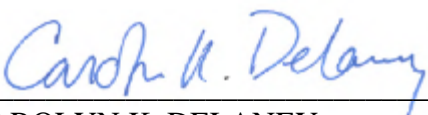
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[PROPOSED] ORDER

Having reviewed the above Stipulation, and good cause appearing, IT IS HEREBY ORDERED that the parties are permitted to take the deposition of inmate witnesses Darryl Geyer at Valley State Prison, Chowchilla, California or any other California Department of Correction institution to which he may be transferred.

IT IS SO ORDERED.

Dated: May 27, 2015



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE