

1 JESMIN ALAM, State Bar No. 201069  
Law Offices of Jesmin Alam  
2 10940 Trinity Parkway, Suite C-295  
Stockton, CA 95219  
3 Telephone: (209) 401-8895  
E-mail: jnalam@hotmail.com  
4 *Attorney for Plaintiff,*  
*Elizabeth Meza*  
5

6 XAVIER BECERRA, State Bar No. 118517  
Attorney General of California  
7 SUSAN E. SLAGER, State Bar No. 162942  
Supervising Deputy Attorney General  
8 TED LINDSTROM, State Bar No. 243664  
Deputy Attorney General  
9 1300 I Street, Suite 125  
P.O. Box 944255  
10 Sacramento, CA 94244-2550  
Telephone: (916) 445-2520  
11 Fax: (916) 324-5567  
E-mail: Ted.Lindstrom@doj.ca.gov  
12 *Attorneys for Defendants*  
*Department of General Services*  
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14 IN THE UNITED STATES DISTRICT COURT  
15 FOR THE EASTERN DISTRICT OF CALIFORNIA  
16

17 **ELIZABETH MEZA,**

18 Plaintiff,

19 v.

20 **STATE OF CALIFORNIA;**  
21 **DEPARTMENT OF GENERAL**  
22 **SERVICES,**

23 Defendants.  
24

2:16-CV-00077-MCE-CKD

**STIPULATION AND ORDER FOR  
MEDICAL EXAMINATION**

Date: March 20, 2017

Action Filed: November 25, 2015

25 **WHEREAS**, Plaintiff Elizabeth Meza has testified, under oath, at her deposition, that she  
26 was sexually harassed by a coworker; and

27 **WHEREAS**, she has also testified that she has experienced extreme and ongoing  
28 emotional distress as a result of the sexual harassment; and

1           **WHEREAS**, Defendant wishes to proceed with a medical examination of Plaintiff in order  
2 to evaluate her claim for emotional distress;

3           **NOW THEREFORE, THE PARTIES AGREE AND STIPULATE AS FOLLOWS:**

4           Plaintiff Elizabeth Meza will submit to a medical/psychiatric examination, pursuant to  
5 Federal Rule of Civil Procedure 35, as follows:  
6

7           **Date:**                                 March 31, 2017

8           **Time:**                                 9:30 am

9           **Location:**                            MOA Deposition Reporters  
10                                                 1760 Creekside Oaks Drive, Suite 175  
11                                                 Sacramento, CA 95833

12           **Examining Physician:**         Matthew F. Carroll, MD (CV attached as Exhibit A)

13           **Manner of Examination:**     Dr. Carroll will interview Plaintiff Meza about her  
14 employment situation, her allegations against the defendant, her medical, financial, legal,  
15 educational, family, marital, and developmental background, her habits, her vocational history,  
16 and other relevant areas of her life. After the interview, he will administer the Minnesota  
17 Multiphasic Personality Inventory test. The total length of the examination will last  
18 approximately four to five hours, depending on various factors, including Plaintiff's cooperation.

19 The only persons permitted in the examination session will be Dr. Carroll and Plaintiff; no one  
20 else will be allowed to attend or be present. Dr. Carroll will tape record the examination session,  
21 but will not provide a copy of the recording to Plaintiff. However, Plaintiff is welcomed to bring  
22 her own recording device and record the session for herself. Plaintiff will not be video-recorded.

23           **Report:**                         Dr. Carroll will be designated as an expert witness and will prepare a report  
24 of his findings and conclusions which meet the requirements of Federal Rules of Civil Procedure  
25 26(a)(2)(B), 35, and any other applicable rule. Upon receiving the report from Dr. Carroll,  
26 Defendant will deliver a copy of the report along with any additional reports regarding the  
27  
28

1 findings of any psychological testing, to Plaintiff's counsel. Defendant will deliver all  
2 supplemental reports to Plaintiff's counsel as they become available. Plaintiff shall have the right  
3 to depose Dr. Carroll, if she deems it necessary.

4 Dated: March 20, 2017

Respectfully submitted,

5 /s/ *Jesmin Alam*

6 JESMIN ALAM  
7 *Attorney for Plaintiff,*  
8 *Elizabeth Meza*

9  
10 Dated: March 20, 2017

XAVIER BECERRA  
Attorney General of California  
SUSAN E. SLAGER  
Supervising Deputy Attorney General

11 /s/ *J. T. Lindstrom*

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13 TED LINDSTROM  
14 Deputy Attorney General  
15 *Attorneys for Defendant,*  
*Department of General Services*

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18 **ORDER**

19  
20 **IT IS SO ORDERED.**

21  
22 Dated: March 22, 2017



23 \_\_\_\_\_  
24 CAROLYN K. DELANEY  
25 UNITED STATES MAGISTRATE JUDGE