

1 XAVIER BECERRA, State Bar No. 118517
Attorney General of California
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Employment Development Department*

8 RICHARD M. ROGERS, #045843
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100 Bush Street, #1980
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12 Attorneys for Plaintiff
13 PATRICIA A. WILLIAMS

14 IN THE UNITED STATES DISTRICT COURT
15 FOR THE EASTERN DISTRICT OF CALIFORNIA
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18 **PATRICIA A. WILLIAMS,**

19 Plaintiff,

20 v.

21 **STATE OF CALIFORNIA**
22 **EMPLOYMENT DEVELOPMENT**
23 **DEPARTMENT,**

24 Defendant.
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2:16-CV-01135-WBS-CKD

**STIPULATION AND ORDER FOR
MENTAL EXAMINATION**

Judge: The Honorable William B.
Shubb

Trial Date: April 17, 2018

Action Filed: May 25, 2016

1 **WHEREAS**, Plaintiff Patricia A. Williams has testified, under oath, at her
2 deposition, that she was harassed, discriminated against and retaliated against on the basis of her
3 race and/or disability; and

4 **WHEREAS**, she has also testified that she has experienced and is experiencing
5 extreme and ongoing emotional distress as a result of the conduct alleged; and

6 **WHEREAS**, Defendant wishes to proceed with a mental examination of Plaintiff in
7 order to evaluate her claim for emotional distress;

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

10 Plaintiff Patricia Williams will submit to a mental/psychiatric examination, pursuant
11 to Federal Rule of Civil Procedure 35, as follows:

12 **Date:** July 28, 2017

13 **Time:** 9:30 a.m.

14 **Location:** MOA Deposition Reporters
15 1760 Creekside Oaks Drive #175,
16 Sacramento, CA 95833

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

18 **Manner of Examination:** Dr. Carroll will interview Plaintiff Patricia A. Williams
19 about her psychological state/condition, including but not limited to, questioning plaintiff about
20 her employment situation, her allegations against the defendant, her medical, financial, legal,
21 educational, family, and developmental background, her habits, her vocational history, and other
22 relevant areas of her life. After the interview, he will administer the Minnesota Multiphasic
23 Personality Inventory test. The total length of the examination will last approximately four to
24 five hours, depending on various factors, including Plaintiff's cooperation. The only persons
25 permitted in the examination session will be Dr. Carroll and Plaintiff; no one else will be allowed
26 to attend or be present. Dr. Carroll will tape record the examination session, but will not provide
27 a copy of the recording to Plaintiff. However, Plaintiff is welcomed to bring her own recording
28 device and record the session for herself. Plaintiff will not be video-recorded.

1 **Report:** Dr. Carroll will be designated as an expert witness and will prepare a
2 report of his findings and conclusions which meet the requirements of Federal Rules of Civil
3 Procedure 26(a)(2)(B), 35, and any other applicable rule. Upon receiving the report from Dr.
4 Carroll, Defendant will deliver a copy of the report along with any additional reports regarding
5 the findings of any psychological testing, to Plaintiff's counsel. Defendant will deliver all
6 supplemental reports to Plaintiff's counsel as they become available. Plaintiff shall have the right
7 to depose Dr. Carroll, if she deems it necessary.

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9 Dated: July __, 2017

Respectfully submitted,

LAW OFFICE OF RICHARD M. ROGERS

RICHARD M. ROGERS
Attorney for Plaintiff Patricia A. Williams

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14 Dated: July __, 2017

XAVIER BECERRA
Attorney General of California
PETER D. HALLORAN Supervising Deputy
Attorney General

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18 LAUREN E. SIBLE
Deputy Attorney General
*Attorneys for Defendant, California
Employment Development Department*

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21 **ORDER**

22 **IT IS SO ORDERED.**

23 Dated: July 18, 2017

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25 _____
CAROLYN K. DELANEY
26 UNITED STATES MAGISTRATE JUDGE
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EXHIBIT A

CURRICULUM VITAE

**MATTHEW F. CARROLL, M.D.
ADULT AND FORENSIC PSYCHIATRY**

501 West Broadway Suite 1340
San Diego, CA 92101
(619) 282-7172
fax (619) 282-7626
e-mail: matthewfcarroll@gmail.com

AREAS OF EXPERTISE:

Fellowship trained and Board Certified Forensic Psychiatrist. Specializing in civil and criminal cases involving psychiatric issues. Thousands of evaluations performed, extensive courtroom experience, valuable clinical expertise.

SERVICES:

Independent Medical Evaluations (IME) • Disability • Fitness for duty • Psychiatric malpractice • Peer review • Emotional distress • Personal injury • Post traumatic stress disorder • Testamentary capacity • Malingering • Competency • Insanity • Pre-sentencing evaluations • Death penalty • Military • Qualified Medical Examiner (QME) • Workman’s Compensation • Emergency Psychiatry • Conservatorship evaluations

EDUCATION:

Cornell University
Ithaca, New York
B.S. (Honors), Biology, June 1984

George Washington University School of Medicine
Washington, D.C.
M.D., May 1989

CLINICAL TRAINING:

Internship
Psychiatry
Naval Medical Center San Diego
July 1989 - June 1990

Residency
Psychiatry
Naval Medical Center San Diego
July 1993 - July 1997

Fellowship
Forensic Psychiatry
Case Western Reserve University
July 1998 - June 1999

EMPLOYMENT:

Forensic Psychiatrist

1 Private Practice
January 2002 to present

2
3 San Diego County Forensic Evaluation Unit
Forensic Psychiatrist
June 2000 to present

4
5 Department of Veterans Affairs
San Diego Compensation and Pension Clinic
Psychiatric evaluations, Post-traumatic stress disorder
6 evaluations (PTSD)
January 2002 to 2013

7
8 San Diego County Psychiatric Hospital
Emergency Psychiatric Unit
Staff Psychiatrist
9 July 1999 to present

10
11 Naval Medical Center San Diego
Forensic Psychiatrist
Staff Psychiatrist
July 1999 - January 2002

12
13 Naval Consolidated Brig
Miramar, San Diego
Consulting Psychiatrist
14 Sex Offender Treatment Program
July 1999 - July 2001

15
16 Naval Hospital Bremerton
Inpatient Medical Director
Medical Director Alcohol Rehabilitation
17 Center
Staff Psychiatrist
18 August 1996 - June 1998

19
20 Naval Alcohol Rehabilitation Center
Pearl Harbor, Hawaii
Medical Director
July 1990 - July 1993

21
22 **MILITARY SERVICE:** Armed Forces Health Professions Scholarship
1984 - 1989

23
24 United States Navy, active duty
May 1989 - January 2002

25
26 **CERTIFICATIONS:** American Board of Psychiatry and Neurology
Board certified in Psychiatry

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28 American Board of Psychiatry and Neurology
Forensic Psychiatry subspecialty certified

Qualified Medical Evaluator (QME)
State of California

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Medical Board of California
Expert Reviewer

California medical license (active)

**UNIVERSITY
AFFILIATIONS:**

Assistant Clinical Professor, University of
California, San Diego (UCSD) School of Medicine
Department of Psychiatry
July 2000 to present

University of San Diego, School of Law
Adjunct Professor
August 2002 – August 2009

**TEACHING AND
PUBLICATIONS:**

Preceptor
UCSD Psychiatry residents and medical students

Naval Medical Center Psychiatry residents
Forensic Evaluation Unit

Lecturer
UCSD Forensic Psychiatry Course

Guest Lecturer
UCSD Psychiatry Department and UCSD School of
Medicine
Guest Lecturer
USD School of Law
Law and Mental Health Course 2002-2009

North City Prevention Coalition- Medical Marijuana- January 9,
2014

American Academy of Psychiatry and the Law- International
Relations Committee site visit, cultural issues, death penalty, right
to die, PTSD and Traumatic Brain Injury October 23, 2013

Lecture on Posttraumatic Stress Disorder/ Traumatic Brain injury
Bonnie R. Moss & Associates April 11, 2012

Lecture on Posttraumatic Stress Disorder
County of Riverside Public Defenders Office- July 9, 2010

Lecture on Mental Competency
San Diego Psych-Law Society – May 28, 2010

Lecture on Substance Abuse for Attorneys
Bonnie R. Moss & Associates – March 3, 2010

Forensic Aspects of Posttraumatic Stress Disorder
American College of Forensic Psychiatry – March 19, 2009

Lecture on Alcohol and Drug Abuse
Law Firm of Latham and Watkins (2006-2009)

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Presentation on Suicide: Practical patient safety for the doctor from risk assessment to risk reduction
American Psychiatric Association – May 24, 2007

American Psychiatric Association – May 24, 2007
Moderator- Medical Board of California Medical Expert Witness Training

Lecture on Right to Refuse Treatment
Mental Health Department, San Diego County (2006)

Lecture on Psychiatric Malpractice
Kaiser Permanente Medical Staff (2004)

Lecture on Legal Aspects of Psychiatry
U.S. Attorneys, San Diego Office (2004)
Lecture on Posttraumatic Stress Disorder
Mental Health Department, San Diego County (2004)

Lecture on Alcohol Induced Blackouts
Office of the District Attorney, San Diego (2003)

● *Additional lectures available on request* ●

Carroll MF: Deception in Military Psychiatry. American Journal of Forensic Psychiatry 2002; 22:1:53-62.

Carroll MF: Malingering in the Military. Psychiatric Annals 2003;33:11:732-736.

PROFESSIONAL AFFILIATIONS:

Fellow of the American Psychiatric Association (FAPA)

American Academy of Psychiatry and the Law

San Diego Psychiatric Society

American College of Forensic Psychiatry

San Diego Psych-Law Society