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9 Attorneys for Defendants
 10 Williams Unified School District; Judith Rossi

11 UNITED STATES DISTRICT COURT
 12 EASTERN DISTRICT OF CALIFORNIA

13	ARMANDO RAMOS,)	Case No. 2:16-cv-01941-JAM-EFB
14)	
15	Plaintiff,)	STIPULATION OF THE PARTIES
16)	REGARDING INDEPENDENT MENTAL
17	vs.)	EXAMINATION; ORDER
18)	
19	WILLIAMS UNIFIED SCHOOL DISTRICT;)	
20	Judith Ross, as an individual, and DOES 1)	
21	through 20,)	
22)	
23	Defendant.)	
24)	
25)	
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27)	
28)	

It is hereby stipulated and agreed by and between Plaintiff, Armando Ramos by and through his attorney of record and Defendant, Williams Unified School District and Judith Rossi, through their attorneys of record that Armando Ramos will submit to an independent mental examination to be performed as follows:

(1) Dr. Ronald H. Roberts, Ph.D., ABPD on March 30, 2018, starting at 10:00 a.m. at M.O.A. Deposition Reporters, 855 Harter Parkway, Ste. 210, Yuba City, CA 95993;

The examination to be performed by Dr. Roberts will consist of psychological testing. It is anticipated the duration of the psychological testing will take approximately four (4) hours,

1 excluding appropriate breaks. Additional time will be allowed, as needed, only to facilitate any
2 needed rest breaks; and

3 (2) Dr. Charles Saldanha, MD, on April 13, 2018 at 10:00 a.m., at M.O.A. Deposition
4 Reporters, 855 Harter Parkway, Ste. 210, Yuba City, CA 95993, will conduct a detailed
5 psychiatric interview lasting approximately five (5) hours. Additional time will be allowed, as
6 needed, only to facilitate any needed rest break.
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8 Dr. Roberts' and Dr. Saldanha's resumes are attached hereto.

9 No attorneys or other third parties shall be present during the testing and interview with
10 Armando Ramos. The psychiatric interview will be recorded by audio and copies of the
11 interview made available to both parties. Plaintiff Armando Ramos may also record the
12 examination. It is agreed the interview is not for purposes of collecting factual information to
13 defend liability in this case and that it is exclusively to evaluate Plaintiff Armando Ramos'
14 emotional and psychiatric state, third party rights of privacy will be maintained.
15

16 The total time spent testing and interviewing Armando Ramos will likely be no more than
17 10-12 hours.
18

19 Plaintiff will obtain, via authorizations signed by Armando Ramos, the following
20 categories of documents:

- 21 1. VA records; and
- 22 2. The documents responsive to the Subpoena served on Greene and Roberts.

23 Upon production of the above-referenced documents Plaintiff will produce all of them
24 except those that Plaintiff contends are privileged. As to privileged documents, Plaintiff agrees
25 to prepare and serve a privilege log by March 23, 2018. The parties will then meet and confer
26 about the documents over which there is disagreement. Absent resolution, the parties agree to
27 submit the issue to the court.
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1
2 IT IS SO STIPULATED.

3 Dated: March 14, 2018

LAW OFFICES OF JILL P. TELFER

4
5 /s/ Jill P. Telfer

6
7 JILL P. TELFER
8 Attorney for Plaintiff
9 ARMANDO RAMOS

10 Dated: March 14, 2018

EVANS, WIECKOWSKI, WARD &
SCOFFIELD, LLP

11
12 /s/ James K. Ward

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14 JAMES K. WARD
15 ERIC R. GARNER
16 Attorneys for Defendant
17 WILLIAMS UNIFIED SCHOOL
18 DISTRICT

19 IT IS SO ORDERED.

20 DATED: March 14, 2018.

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EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE