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2 2. Dr. Rosenberg is a physician licensed to practice medicine in the State
3 of California. Dr. Rosenberg received his medical degree from the UCLA School
4 of Medicine, and completed a transitional internship, a residency in psychiatry at
5 the UCLA Neuropsychiatric Institute, and a fellowship in forensic psychiatry at
6 Case Western Reserve University School of Medicine in Cleveland, OH. Dr.
7 Rosenberg is board-certified in psychiatry by the American Board of Psychiatry &
8 Neurology, Inc. In addition to his extensive teaching and patient-care experience,
9 he has conducted over 1,000 medico-legal evaluations. A complete copy of Dr.
10 Rosenberg's curriculum vitae is attached as Exhibit A to the parties' Stipulation.

11 3. Dr. Rosenberg will conduct a psychiatric examination of Plaintiff to
12 assist Defendant Wal-Mart Stores, Inc. and its counsel with regard to understanding
13 Plaintiff's alleged complaints of psychiatric injury and its sequelae, including the
14 origin, nature, and severity of Plaintiff's alleged mental health injuries, and in turn,
15 prognosis and future treatment needs, if applicable.

16 4. The psychiatric examination will span approximately five to six hours,
17 excluding breaks. It will consist of a detailed interview, mental status examination,
18 and appropriate, generally accepted standardized psychological testing and
19 screening cognitive assessment; specifically MMPI-2-RF, Personality Assessment
20 Inventory (PAI), Trauma Symptom Inventory – 2 (TSI-2), and Mini Mental State
21 Examination – 2 (MMSE-2). Attached as Exhibit B to the Stipulation is a complete
22 description of Dr. Rosenberg's standard psychiatric evaluation.

23 5. Dr. Rosenberg will audio record the entire psychiatric evaluation.
24 Plaintiff may also audio record the examination, but no one else may be present in
25 the room during the evaluation. The examination shall not be videotaped.

26 6. The psychiatric evaluation will not involve any physical examination.
27 There will be no blood tests or other intrusive medical studies or procedures. The
28 examination will be conducted at a location at or near Vacaville, California.

