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 ROCKLIN UNIFIED SCHOOL DISTRICT,  
 PLACER COUNTY OFFICE OF EDUCATION AND DAVID HAWKINS  
Public Entity-Public Employees – Filing Fees Waived

**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION**

10	ALICIA WAGNON in her individual capacity and as conservator for SULLIVAN R. FROM,	)	<b>CASE NO: 2:17-cv-01666-KJN</b>
11		)	
12	Plaintiffs,	)	<b>Stipulation and Order Regarding</b>
13		)	<b>Independent Mental Examination</b>
14	vs.	)	<b>Date of IME: October 3, 2022</b>
15		)	<b>Time: 10:00 a.m.</b>
16	ROCKLIN UNIFIED SCHOOL DISTRICT, PLACER COUNTY OFFICE OF EDUCATION, DAVID HAWKINS and Does 1-30,	)	<b>Location: 5413 Sandpiper Court, Rocklin</b>
17		)	
18	Defendants.	)	
19		)	

20 Defendants ROCKLIN UNIFIED SCHOOL DISTRICT, PLACER COUNTY OFFICE  
 21 OF EDUCATION AND DAVID HAWKINS (Hereinafter “Defendants”) and Plaintiffs hereby  
 22 stipulate to the following conditions of Plaintiff Sullivan From’s IME:

23  
 24 As to the date, time, place and length of the exam, counsel for the parties agree the IME  
 25 shall take place at Plaintiff’s home 5413 Sandpiper Court, Rocklin 95765, at 10:00 a.m. on  
 26 October 3, 2022. The length of the exam will be 2.0 hours.

27 Pursuant to the Court’s Order, the court will not set limitations on the kinds of tests Dr.  
 28 Greene will be allowed to conduct. [See, e.g., Newman, 272 F.R.D. 505 (declining to limit the

1 kinds of tests proposed without evidence that certain tests will be dangerous to the examinee).]  
2 Further, no specific limits are set on Dr. Greene's questioning of Plaintiff Wagnon concerning  
3 Plaintiff From's history. However, defendants are cautioned that Dr. Greene's exam shall not be  
4 harassing to plaintiffs and shall not act as a second deposition. Thus, to the extent Dr. Greene can  
5 conduct any investigation of Plaintiff From's history prior to the examination, so as to lessen the  
6 burden on Plaintiff Wagnon, the doctor shall do so.  
7

8 Finally, Plaintiff Wagnon may terminate Dr. Greene's examination if at any time, she  
9 feels, in good faith, that the examination is overly traumatizing to her son. Counsel for plaintiff  
10 shall review this good faith standard with Plaintiff Wagnon before the examination and shall  
11 make her aware that if the examination is ended early, it will be rescheduled for a future date.  
12

13 However, if the exam is prematurely terminated, it will be rescheduled to continue on a  
14 future date. The court will endeavor to make itself available on the day of the examination,  
15 should any good faith disputes arise requiring court intervention.  
16

17 Dated: September 15, 2022

Evans Wieckowski Ward & Scoffield, LLP

18  
19 By: /s/ Cathleen Fralick  
20 Cathleen Fralick, Attorney for  
21 Defendants Rocklin Unified School  
22 District, Placer County Office of Public  
23 Education, and David Hawkins

24  
25 Dated: September 26, 2022

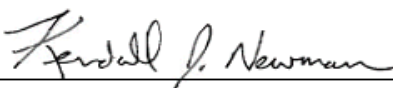
Medina, McKelvey LLP

26 By: /s/ Allison Hyatt  
27 Allison Hyatt, Attorney for  
28 Plaintiffs Alicia Wagnon, in her individual  
capacity and as conservator for Sullivan  
From

1  
2 **ORDER**

3 It is HEREBY ORDERED that pursuant to the parties' stipulation above, the Independent  
4 Medical Examination will be conducted on the conditions outlined above.  
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6 Dated: September 28, 2022

7   
8 KENDALL J. NEWMAN  
9 UNITED STATES MAGISTRATE JUDGE

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