

1 Kristine L. Mollenkopf (SBN No. 185914)  
 2 Kristine.mollenkopf@lincolnca.gov  
 3 City Attorney  
 4 City of Lincoln, City Attorney's Office  
 5 600 Sixth Street  
 6 Lincoln, CA 95648  
 7 Tel: (916) 434-2428/Fax: (916) 654-8903

8 William D. Brown (SBN No. 125468)  
 9 bbrown@brownandwinters.com  
 10 Jeffrey T. Orrell (SBN No. 237581)  
 11 jorrell@brownandwinters.com  
 12 Janet Menacher (SBN No. 291365)  
 13 jmenacher@brownandwinters.com  
 14 Charles D. Grosenick (SBN 317715)  
 15 cgrosenick@brownandwinters.com  
 16 120 Birmingham Drive  
 17 Cardiff-by-the-Sea, CA 92007-1737  
 18 Tel: (760) 633-4485/Fax: (760) 633-4427

Attorneys for Plaintiff/Counter-Defendant CITY OF LINCOLN

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

18 CITY OF LINCOLN,	)	
	)	Case No.: 2:18-CV-00087-KJM-AC
19 Plaintiff/Counter-Defendant	)	
	)	
20 v.	)	<b>JOINT STIPULATION AND</b>
	)	<b>[PROPOSED] ORDER REGARDING</b>
21 COUNTY OF PLACER; and DOES 1 through	)	<b>DOCUMENT AUTHENTICATION</b>
22 100, inclusive,	)	
	)	
23 Defendant/Counterclaimant.	)	
	)	
	)	
	)	
26	)	

1 The parties to the above-captioned action, Plaintiff/Counter-Defendant City of Lincoln (“City”)  
2 and Defendant/Counterclaimant County of Placer (“County”) (hereinafter collectively, the “Parties”),  
3 have met and conferred regarding the goal of streamlining the presentation of evidence at trial and  
4 preserving judicial and litigation resources. The Parties have agreed and hereby stipulate to the specific  
5 terms set forth below, and respectfully request that the Court ratify and enter an Order as follows:

- 6 1. The Parties agree to not dispute the authenticity of the documents identified by “Bates”  
7 numbers and enumerated herein.
- 8 2. The Parties further stipulate to undertake a good faith effort to supplement the list of  
9 documents whose authenticity the Parties agree to not dispute.

10 The documents identified by “Bates” numbers that are subject to the Parties’ instant stipulation  
11 are as follows:

12 CITY004038; CITY004044; CITY004046; CITY004078; CITY004144; CITY004146; CITY051356;  
13 CITY051369; CITY051386; CITY051414; CITY051424; CITY051441; CITY051459; CITY051474;  
14 CITY051476; CITY051513; CITY051540; PLACER0005; PLACER0085; PLACER0098;  
15 PLACER0099; PLACER0109; PLACER0203; PLACER0212; PLACER0213; PLACER0214.

16 **SO STIPULATED.**

17  
18 Dated: October 1, 2020

BROWN & WINTERS

19  
20 By: /s/ Charles D. Grosenick  
21 CHARLES D. GROSENICK  
22 Attorney for Plaintiff/Counter-Defendant,  
CITY OF LINCOLN

23 Dated: October 1, 2020

HARTMAN KING PC

24 By: /s/ Alanna Lungren (Authorized on 10/1/2020)  
25 JENNIFER HARTMAN KING  
26 ALANNA LUNGREN  
27 ANDREYA WOO NAZAL  
Attorneys for Defendant/Counterclaimant  
COUNTY OF PLACER

28 ///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

Pursuant to the above stipulation of the Parties:

**IT IS SO ORDERED.**

Dated: October 2, 2020

  
\_\_\_\_\_  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE