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19 Attorneys for Plaintiff/Counter-Defendant CITY OF LINCOLN

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

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

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  
7 “Bates” numbers and enumerated in the attached Exhibit 1.
- 8 2. That a document is stipulated to as authentic in Exhibit 1 does not waive either  
9 Party’s ability to object to the admission of the document into evidence on grounds  
10 of relevance, hearsay-within-hearsay, or any other lawful objection.
- 11 3. The Parties further stipulate to undertake a good faith effort to supplement the list  
12 of documents whose authenticity the Parties agree to not dispute.
- 13 4. The Parties intend that this First Amended Joint Stipulation and [Proposed] Order  
14 Regarding Document Authentication (hereinafter, “Amended Joint Stipulation”)  
15 supersede and replace the Joint Stipulation and Order Regarding Document  
16 Authentication, signed by the Court on 2 October 2020 (attached hereto, as Exhibit  
17 2). The Parties further intend that all documents previously listed in Exhibit 2 have  
18 been incorporated into this Amended Joint Stipulation, for efficiency and ease of  
19 reference, as shown within Exhibit 1.

20 **SO STIPULATED.**

21 Dated: December 3, 2021

BROWN & WINTERS

22 By: /s/ Charles D. Grosenick  
CHARLES D. GROSENICK

23 Attorneys for Plaintiff and Counter-Defendant  
CITY OF LINCOLN

24 Dated: December 1, 2021

HARTMAN KING PC

25 By: /s/Alanna Lungren  
JENNIFER HARTMAN KING

26 ALANNA LUNGREN  
27 J. R. PARKER  
ANDREYA WOO NAZAL  
28 Attorneys for Defendant and  
Counter-Claimant COUNTY OF PLACER

**ORDER**

Pursuant to the above stipulation of the Parties:

**IT IS SO ORDERED.**

Dated: December 6, 2021

  
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ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE

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