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10 Attorneys for Plaintiff Abhinav Bhatnagar

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

13 ABHINAV BHATNAGAR,

14 Plaintiff,

15 vs.

16 JASON INGRASSIA, individually and in
 his official capacity; COUNTY OF
 17 CONTRA COSTA; and CITY OF
 18 SAN RAMON.

19 Defendants.

) Case No.: 3:07-cv-02669 (CEB)(EDL)

) **STIPULATION RE: EXCLUSION OF**
) **EVIDENCE RE: PLAINTIFF'S PAST OR**
) **CURRENT IMMIGRATION STATUS**

) Trial Date: December 8, 2008
) Time: 8:30 am
) Honorable Charles R. Breyer

1 All parties, by and through their respective counsel, hereby stipulate that there will be no
2 evidence presented by way of documents, testimony, or argument concerning Plaintiff's current
3 or past immigration status. This does not preclude either party from asking questions as to
4 Plaintiff's ethnicity or the defense from introducing into evidence Defendant Ingrassia's
5 testimony that he questioned Plaintiff regarding his place of birth.

6 **IT IS SO STIPULATED:**

7 Dated: November 25, 2008
8 Oakland, California

JUSTICE FIRST, LLP
Attorneys for Plaintiff Abhinav Bhatnagar
By:
_____/s/ Jenny Huang_____
Jenny C. Huang
2831 Telegraph Avenue
Oakland, CA 94609

12 Dated: November 25, 2008
13 Martinez, California

JANET HOLMES
Attorney for Contra Costa County and
the City of San Ramon
By:
_____/s/ Janet Holmes_____
Ms. Janet Holmes
Contra Costa County Counsel's Office
651 Pine Street, 9th Floor
Martinez, CA 94553

18 Dated: November 25, 2008
19 Walnut Creek, California

JAMES FITZGERALD
Attorney for Defendant Jason Ingrassia
By:
_____/s/ James Fitzgerald_____
Mr. James Fitzgerald
McNamara Dodge et al. LLP
P. O. Box 5288
Walnut Creek, CA 94596-1288

24 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

25 December 01
26 Dated: ~~November~~ _____, 2008

27 UNITED STATES DISTRICT COURT OF THE DISTRICT OF CALIFORNIA

