Fac swi Adr Att BA LA CA LA CA LA DE 655 Sac Pho Fac E-n Att		D. 150680 und
Per OF and Rep Rya Ind TA v.	LERIE GEORGE, as Administrator and) sonal Representative of THE ESTATE) RYAN GEORGE; VALERIE GEORGE) //or TAJMAH BEAUCHAMP, as Legal) oresentative(s) for Jaida George and) an George, Jr.; VALERIE GEORGE,) ividually; DONALD GEORGE; and) JMAH BEAUCHAMP, Individually,) Plaintiff,) TTER HEALTH; SUTTER MEDICAL) NTER OF SANTA ROSA,) Defendants.)	CASE NO.: 3:08-cv-02675-EDL STIPULATION AND [PROPOSED] ORDER REGARDING RYAN GEORGE'S PERSONAL HISTORY AND PRIOR ACTS

SUBJECT TO THE APPROVAL OF THE COURT, IT IS HEREBY STIPULATED 1 BY AND BETWEEN THE PARTIES HERETO, THROUGH THEIR RESPECTIVE 2 3 COUNSEL OF RECORD, THAT THE FOLLOWING STATEMENTS REGARDING 4 RYAN GEORGE'S PERSONAL HISTORY AND PRIOR ACTS SHALL BE 5 ADMISSIBLE AT THE TRIAL OF THIS MATTER:

6

7

8

1. That on or about July 12, 2006 and on or about November 22, 2006, Tajmah Beauchamp obtained Emergency Protective Orders against Ryan George, after she alleged that Ryan George assaulted her.

- 9 2. That on or about January 26, 2007, Tajmah Beauchamp obtained a Temporary 10 Restraining Order and Notice of Hearing against Ryan George. Ms. Beauchamp alleged that 11 Mr. George assaulted and/or threatened her on three occasions between November 2006 and 12 January 2007. This Temporary Restraining Order was subsequently dismissed on February 20, 13 2007 when neither Ms. Beauchamp nor Mr. George appeared for the hearing.
- 14

3. That on July 29, 2005, Tajmah Beauchamp filed a Complaint against Ryan 15 George for Child Support in favor of minor Jaida George. In that Complaint, Ms. Beauchamp 16 sought support of \$255 per month by Mr. George for Jaida George, as well as one-half of all 17 reasonable medical, dental, and vision costs incurred on behalf of Jaida George, beginning 18 August 1, 2005. Judgment establishing that Mr. George was to pay this child support was 19 entered by Sonoma County Superior Court on November 18, 2005. Mr. George did not pay the 20 amount of child support that was ordered by the Court, but he did pay for some of the other 21 expenses of Jaida George.

22

23 24

4. That Ryan George had previously been convicted of a misdemeanor for which he served 30 days with two years probation.

5. That on February 22, 2007, in Sonoma County Superior Court Case No. SCR-25 491724, Ryan George pleaded guilty to the felony crime of inflicting injury upon a cohabitant, 26 former cohabitant, or the mother of his child (Penal Code § 273.5). 27

28

6. That as a result of pleading guilty on February 22, 2007, Ryan George had been			
incarcerated in Sonoma County Adult Detention Facility for 39 days, from May 31, 2007 until			
the time of his death on July 9, 2007.	He was scheduled	to be released in approximately	
December 2007.			
SO STIPULATED.			
Dated: February 8, 2011	LA FOLLETTE, JOHNSON, DE HAAS, FESLER & AMES		
Dated. Teordary 0, 2011			
	/S/ CAMERON	J. WHITEHEAD	
By:	CAMERON J.WHITEHEAD, SBN 150680		
	Attorney for Def	endants,	
		TH and SUTTER TER OF SANTA ROSA	
DATED: February 8, 2011 SANFORD WITTELS & HEISLER, LLP			
	/S/ STEV	'EN WITTELS	
	By: <u>STEVEN</u>	WITTELS, ESQ.	
		s for PLAINTIFFS	
PROPOSED ORDER			
PURSUANT TO STIPULATION, IT IS SO ORDERED.			
DATED: February 9 . 2011	El.	ha D I cont	
,			
	UNITED STAT	ES MAGISTRATE JUDGE	
		Case No. 3:08-cv-02675-EDI Page No. 3	
		Luge 100	
	incarcerated in Sonoma County Adult Dete the time of his death on July 9, 2007. F December 2007. SO STIPULATED. Dated: February 8, 2011 By: DATED: February 8, 2011 SANF PURSUANT TO STIPULATION, IT IS SO DATED: _February 9, 2011 STIPULATION AND [PROPOSED] ORDER REGAR	incarcerated in Sonoma County Adult Detention Facility for the time of his death on July 9, 2007. He was scheduled December 2007. SO STIPULATED. Dated: February 8, 2011 LA FOLLETTH DE HAAS, FES By: (S/ CAMERON J.W Attorney for Def SUTTER HEAL MEDICAL CEN DATED: February 8, 2011 SANFORD WITTELS By: (S/ STEV By: (S/ STEV S/ STEV	