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2 MARINA B. PITTS (SBN: 120973)  
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9 Attorneys for Defendants  
10 WILLITS CHARTER SCHOOL and  
11 SALLY RULISON

12 UNITED STATES DISTRICT COURT  
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA

14 JANE DOE, a minor, through KRISTEN  
15 D., Guardian ad Litem,

16 Plaintiff,

17 vs.

18 WILLITS UNIFIED SCHOOL DISTRICT,  
19 WILLITS CHARTER SCHOOL,  
20 SALLY RULISON, CLINT SMITH and  
21 DOES 1-40,

22 Defendants.

**Case No.: CV 09-3655 JSW**

**STIPULATION AND ORDER TO  
ALLOW MENTAL EXAMINATION OF  
THE PLAINTIFF JANE DOE**

**Trial Date: November 1, 2010**

**Exam Date: July 7, 2010**

**Time: 10:00 a.m.**

**Location: 3841 24th Street  
San Francisco, CA**

23 THE PLAINTIFF AND DEFENDANTS WILLITS CHARTER SCHOOL AND SALLY  
24 RULISON, BY AND THROUGH THEIR ATTORNEYS OF RECORD, HEREBY  
25 STIPULATE AS FOLLOWS:

26 1. That plaintiff JANE DOE, a minor, by and through her guardian ad litem,  
27 KRISTEN D., undergo a mental examination pursuant to FRCP 35, as plaintiff has  
28 placed her mental condition in controversy;

2. That the examination occur on July 7, 2010 at 10:00 a.m. with Dr. Anlee  
Kuo, M.D. at 3841 24th Street in San Francisco, California; Dr. Kuo's CV is attached  
hereto as Exhibit A.

1 3. That said examination will consist of an oral interview and evaluation of the  
2 plaintiff, and obtaining of a developmental and psychological history regarding the  
3 plaintiff from plaintiff's mother/guardian ad litem, and will not exceed 4 hours.

4 4. That said examination will not consist of any tests or procedures which  
5 would be painful, protracted or intrusive to the plaintiff.

6 **IT IS SO STIPULATED:**

7  
8 Date: May 28, 2010

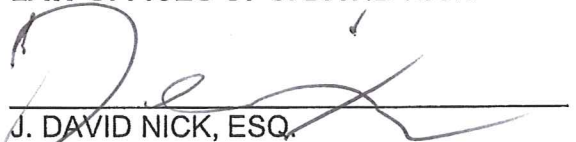
**LAW OFFICES OF E.D. LERMAN**

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E.D. LERMAN, ESQ.  
Attorneys for Plaintiff JANE DOE

11  
12  
13 Date: MAY 28, 2010

**LAW OFFICES OF J. DAVID NICK**

14  
15 

J. DAVID NICK, ESQ.  
Attorneys for Plaintiff JANE DOE

16  
17 Date: June 7, 2010

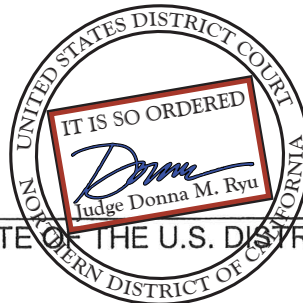
**STUBBS & LEONE**

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MARINA B. PITTS, ESQ.  
Attorney for Defendants  
WILLITS CHARTER SCHOOL,  
SALLY RULISON

20  
21  
22  
23 **IT IS SO ORDERED:**

24  
25  
26 Date: June 14, 2010



27  
28 MAGISTRATE OF THE U.S. DISTRICT COURT

# EXHIBIT A

## CURRICULUM VITAE

Prepared 3-17-10

**Name:** Anlee Kuo, J.D., M.D.  
**Address:** 3841 24<sup>th</sup> Street  
San Francisco, CA 94114  
177 Bovet Road  
San Mateo, CA 94402  
**Phone:** (415) 516-3621

### EDUCATION:

<b>Dates</b>	<b>Institution Attended &amp; Location</b>	<b>Degree or Status</b>	<b>Major Subject</b>
Summer 1984	Minzu National Language Institute Beijing, China	Completed	Chinese language and history
1984-88	Dartmouth College, Hanover, NH	B.A., <i>cum laude</i>	Asian Studies
1989-92	New York University School of Law New York, NY	J.D.	Law
1994-98	Johns Hopkins University Medical School Baltimore, MD	M.D.	Medicine
1998-99	University of California, San Francisco	Pediatric Internship	Pediatrics
1999-02	University of California, San Francisco Department of Psychiatry	Residency	Psychiatry
2002-03	University of California, San Francisco Child and Adolescent Psychiatry Fellowship	Child Fellow	Psychiatry
2003-04	University of California, San Francisco Forensic Psychiatry Fellowship	Forensic Fellow	Psychiatry

### EMPLOYMENT:

1991 Rogers and Wells  
Legal Assistant  
1992-93 Long Island University

- 2000-01 Laboratory Assistant  
Saint Luke's Hospital  
Part-time Psychiatrist on the Inpatient Adult Psychiatry Unit
- 2001 San Mateo County Hospital  
Part-time Psychiatrist in Psychiatric Emergency Services and the Adult Inpatient  
Psychiatry Unit
- 2004-2006 San Mateo County Mental Health  
Staff Member, Adult, Child and Adolescent Psychiatrist
- 2004- Private Practice  
Adult, Child, Adolescent and Forensic Psychiatrist

### HONORS AND AWARDS:

- 1987 Cobra Senior Honor Society (one of twenty women honored by the Class Dean for  
"outstanding contributions to the Dartmouth community")
- 1987 Xerox grant to study acupuncture in China
- 1987-88 Rufus Choate Scholar (top 5 percent of undergraduate class at Dartmouth College)
- 1990 *Journal of International Law and Politics*, Editorial Staff
- 1995 Johns Hopkins University School of Medicine: National Health Service Corp Fellowship
- 2002 Rapoport Fellowship (awarded by the American Academy of Psychiatry and the Law to  
four or five "outstanding residents" in the country "with interests in psychiatry and the law")
- 2001-02 The Laughlin Award of the National Psychiatric Endowment Foundation (awarded by the  
Langley Porter Psychiatric Institute for "excellence in therapeutic skills and dedication to the  
welfare of patients")
- 2003 Irving Philips, M.D. Memorial Award for Excellence in Child and Adolescent Psychiatry  
(awarded by the Langley Porter Psychiatric Institute)

### MEMBERSHIPS:

- 2001- American Psychiatric Association
- 2001- Northern California Psychiatric Society
- 2001- American Academy of Child and Adolescent Psychiatry
- 2002- American Academy of Psychiatry and the Law  
Child and Adolescent Psychiatry and the Law, Committee Member

### LICENSES, CERTIFICATES:

- 1999 Medical License, California, A69776 (active)
- 2003 Qualified Medical Examiner, State of California
- 2005 Diplomate of the American Board of Psychiatry and Neurology; Triple Board  
certified in (1) Adult Psychiatry (2005)(2) Child and Adolescent Psychiatry (2008)  
and (3) Forensic Psychiatry (2009)

### TEACHING EXPERIENCE:

- 2002-03 Supervised two psychiatry residents in Child Psychiatry Evaluation Clinic, UCSF  
2003-04 Supervised several medical students and psychiatry residents in rotations in the Forensic Psychiatry Fellowship  
2006- Assistant Clinical Professor in the Department of Psychiatry, University of California, San Francisco

**FORENSIC EXPERIENCE:**

- 2003-2005
- Child custody evaluations for San Francisco Family Court
  - Parenting assessments and child mental health assessments in dependency cases. Worked for the Child Trauma Project in San Francisco
  - Competency to stand trial assessments, diagnostic evaluations and risk assessments for juvenile and adult criminal court including the Youth Guidance Center and the Behavioral Health Court in San Francisco
  - Forensic assessment involving child trauma, including emotional, physical and sexual abuse allegations
  - Workmen’s compensation evaluations
  - Psychiatric and violence risk assessments for Board of Prison Terms at San Quentin Prison
  - Psychiatric assessments of juvenile offenders at Hillcrest Juvenile Hall in San Mateo County, California and Youth Guidance Center in San Francisco

**RESEARCH EXPERIENCE:**

- 1987 Xerox grant: Worked in the traditional Chinese medicine division of the People’s Hospital in Beijing. Studied the theory and effectiveness of acupuncture while teaching English to the hospital staff.
- 1995 National Health Service Corp Fellowship: Developed preventative health radio broadcast message and studied its effect on local child immunization practices in a small rural town in Montana.
- 1996 Combined pediatrics/adolescent psychiatry elective: Studied prevalence of iron deficiency in adolescents at a substance abuse clinic in Baltimore.

**PRESENTATIONS:**

- 10-18-02 Child Grand Rounds on “Role Clarification on Our Work with Children of Divorce” at UCSF  
6-1-04 Lecture on Juvenile Court System at UCSF  
6-8-04 Lecture on Domestic Violence and it’s Impact on Children at UCSF  
10-13-04 Lecture on Child Forensic Psychiatry at California Pacific Medical Center  
5-20-05 Lecture on Child Forensic Psychiatry at San Mateo County Medical Center  
5-30-06 Lecture on Assessment and Treatment of Juvenile Offenders at UCSF  
6-6-06 Lecture on Domestic Violence and the Impact on Children at UCSF  
6-13-06 Lecture on Divorce and the Role of the Child Evaluator at UCSF  
10-26-07 Lecture on Child, Adolescent, Adult and Forensic Psychiatry, Career Development at American Academy of Child and Adolescent Psychiatry  
1-29-10 Lecture on the Phenomena of Estrangement and Alienation in Divorce at UCSF

**PUBLICATIONS:**

- 2003 Forensics Chapter for the Textbook of Child and Adolescent Psychiatry, Third Edition (Co-author: John Sikorski, M.D.)
- 2004 The Journal of the American Academy of Psychiatry and the Law, 2004, Volume 32, No.3, Legal Digest, p. 335-339
- 2006 Divorce and Custody Chapter for Lewis's Child and Adolescent Psychiatry: A Comprehensive Textbook, Fourth Edition (Co-author: John Sikorski, M.D.)
- 2007 Legal and Ethical Issues in American Psychiatric Publishing Inc's Textbook of Child and Adolescent Psychiatry, (Co-author: John Sikorski, M.D.), Publication pending

**COMMUNITY/PUBLIC SERVICE:**

- 1995 Provided basic health education on oral rehydration techniques and studied Spanish in Quetzaltenango: El Central Institute de Guatemala.
- 1986-91 Volunteered in pediatric departments of several U.S. hospitals: St. Vincent's Hospital in NYC; Mary Hitchcock Hospital in N.H.