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 UNIFIED SCHOOL DISTRICT, BARBARA  
 7 WILSON AND PERCY MCGEE

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 9 **UNITED STATES DISTRICT COURT**

10 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

11  
 12 TIM GALLI,  
 13 Plaintiff,  
 14 vs.  
 15 PITTSBURG UNIFIED SCHOOL  
 DISTRICT, BARBARA WILSON AND  
 16 PERCY MCGEE,  
 17 Defendants.

CASE NO. 3:09-cv-03775-JSW

**JOINT STIPULATION AND RELATED  
 MATTERS ~~[PROPOSED]~~ PROTECTIVE  
 ORDER**

Trial Date: May 9, 2011

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 19 **THE PARTIES HEREBY STIPULATE AS FOLLOWS:**

20 1. In lieu of a supplementary deposition compelled regarding Barbara Wilson's  
 21 investments through the Gallo Group, Defendants' counsel has represented that, within thirty (30)  
 22 days of this stipulation, Barbara Wilson will produce a declaration signed and sworn under oath  
 23 ("Declaration") attesting to the following:

24 A. Barbara Wilson did have investments, commencing on X date (to be completed by  
 25 Dr. Wilson), through the Gallo Group.

26 B. The April 30, 2009 Merrill Lynch statement is the last statement Defendant Barbara  
 27 Wilson received from Merrill Lynch indicating Percy McGee had any involvement with the  
 28 management of her and her husband's accounts, including the Gallo Group.

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1 C. It is Dr. Wilson's understanding and belief, based on this information, that  
2 thereafter Mr. McGee had no involvement with and has received no income from any of Dr.  
3 Wilson's accounts or those of her husband.

4 DDr. Wilson was not aware of any business relationship Percy McGee had with Ralph  
5 Caputo or RGM, and only learned of that after April 22, 2010 through her legal counsel.

6 2. The parties agree and stipulate that the Declaration is admissible in any proceeding  
7 in this matter and shall be fully admissible for any purpose and shall be deemed authentic, best  
8 evidence, and non-hearsay for purposes of this action. Defendants agree that they shall not object  
9 to the admission or use of the Declaration for any purpose at trial.

10 3. If Defendants do not produce the Declaration timely, Defendants will proffer Dr.  
11 Wilson for deposition within thirty (30) days on the above topics. If Defendants fail to produce  
12 the Declaration and fail to produce Dr. Wilson for deposition, Plaintiff may move to compel the  
13 same and shall be entitled to fees and costs incurred for filing such motion.

14 4. Barbara Wilson will provide appropriate financial information based upon an  
15 outline of information to be provided by Plaintiff's counsel. This information is being provided  
16 solely for "Legal Counsel's Eye's Only" and shall not be shared with any other person, including  
17 Plaintiff, until ordered by the Court. To the extent there is a disagreement between the parties  
18 about the nature or scope of the financial information to be provided, the parties shall meet and  
19 confer in an attempt to resolve the disagreement, and if no resolution occurs through the meet and  
20 confer efforts, the parties agree to submit the disagreement to the Court for resolution via motion.

21 **SO STIPULATED.**

22 DATED: September 3, 2010

Respectfully submitted,

FAGEN FRIEDMAN & FULFROST, LLP

By:

Roy A. Combs  
Attorneys for Defendants PITTSBURG UNIFIED  
SCHOOL DISTRICT, BARBARA WILSON  
AND PERCY MCGEE

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DATED: September 3, 2010

Respectfully submitted,

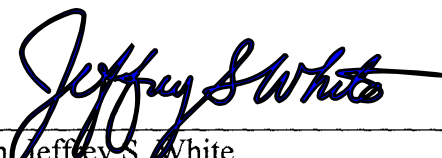
THE EMPLOYMENT LAW GROUP, P.C.

By:   
David Scher  
Attorneys for Plaintiff TIM GALLI

**[PROPOSED] ORDER**

THE COURT HEREBY ACCEPTS THIS STIPULATION IN ACCORDANCE WITH  
ITS TERMS

DATED: September 7, 2010

  
Hon. Jeffrey S. White  
UNITED STATES DISTRICT JUDGE

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