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4	San Jose, California 95110-1770 Telephone: (408) 299-5900			
5	Facsimile: (408) 292-7240 Attorneys for Defendants COUNTY OF SANTA CLARA and its			
6				
7	SANTA CLARA VALLEY MEDICAL			
	CENTER, HOLLISTER BREWSTER, M.D., ALFONSO BANUELOS, M.D., DOLLY COEL, M.D., and			
8	DOLLY GOEL, M.D., and PETER GREGOR, M.D.			
9				
10	UNITED STATES DISTRICT COURT			
11	FOR THE NORTHERN DISTRICT OF CALIFORNIA (San Francisco)			
12				
13				
14	THRESSA WALKER et al.,	No. 10-CV-04668 RS		
15	Plaintiffs,	STIPULATION AND [PROPOSED] ORDER STAYING NET-WORTH DISCOVERY		
16	v.			
17	COUNTY OF SANTA CLARA et al.,			
18	Defendants.			
19				
20				
21	The parties, through their respective counsel of record, hereby stipulate and agree to an order			
22	staying Plaintiffs' proposed net-worth discovery respecting their punitive damage allegations against			
23	Defendants Alfonso Banuelos, M.D., Dolly Goel, M.D., Hollister Brewster, M.D., and Peter Gregor,			
24	M.D., until after the date by which all pretrial motions are to be heard (March 7, 2013). If deemed			
25	necessary, Plaintiffs shall be permitted to conduct such limited discovery until March 29, 2013,			
26	which should not delay the submittal of pretrial documents. This issue was discussed with United			
27	States District Judge Richard Seeborg during the further case management conference on July 19,			
28	2012. At that time, Judge Seeborg suggested that the parties consider entering into an appropriate 1			
	Stipulation and [Proposed] Order 10-CV-04668 RS Staying Net-Worth Discovery 10-CV-04668 RS			

1	stipulation for submittal to Magistrate Judge Joseph C. Spero.		
2	I hereby attest that I have on file all holograph signatures for any signatures indicated by a		
3	"conformed" signature (/S/) within this efiled document.		
4		LORI E. PEGG	
5		ACTING COUNTY COUNSEL	
6	Dated: July 31, 2012 By:	: <u>/S/</u> GREGORY J. SEBASTINELLI	
7		Deputy County Counsel	
8		Attorneys for Defendants COUNTY OF SANTA CLARA and its	
9		SANTA CLARA VALLEY MEDICAL CENTER, HOLLISTER BREWSTER, M.D.,	
10 11		ALFONSO BANUELOS, M.D., DOLLY GOEL, M.D., and PETER GREGOR, M.D.	
12			
13		LAW OFFICES OF BONNER & BONNER	
14	Dated: July 31, 2012 By:	: /S/	
15		: <u>/S/</u> CHARLES A. BONNER, ESQ.	
16		Attorneys for Plaintiffs GEETA SINGH, M.D., and KAI IHNKEN, M.D.	
17 18			
	ORDER		
19 20	IT IS SO ORDERED. Plaintiffs' proposed net-worth discovery respecting their punitive		
20 21	damage allegations against Defendants Alfonso Banuelos, M.D., Dolly Goel, M.D., Hollister		
21	Brewster, M.D., and Peter Gregor, M.D., shall be stayed until March 7, 2013. If deemed necessary,		
22	Plaintiffs shall be permitted to conduct such limited discovery until March 29, 2013.		
23 24	Dated: <u>August 1, 2012</u>	JOSEPHOC. SPERO	
25		United Standard ge	
26		Judge Joseph C. Spero	
27	THER DISTRICT OF CR		
28	614149.DOC		
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