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6 **ATTORNEYS FOR** Defendant
 7 UNITED AIR LINES, INC.

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

11 CHRISTINE ALLEN,
 12
 13 Plaintiff,
 14 vs.
 15 UNITED AIR LINES, INC., a Delaware
 corporation; and DOE ONE through DOE
 16 ONE HUNDRED, inclusive,
 17 Defendants.

Case No. CV 11 3326 RS (MEJ)
 STIPULATION FOR ORDER REGARDING
 PHYSICAL EXAMINATIONS
 OF PLAINTIFF CHRISTINE ALLEN

18 WHEREAS plaintiff CHRISTINE ALLEN (hereinafter “plaintiff”) asserts claims in this action
 19 that she suffered injuries of an orthopedic and neurological nature; and

20 WHEREAS plaintiff has placed certain orthopedic and neurological conditions in controversy in
 21 this case; and

22 WHEREAS defendant UNITED AIR LINES, INC. (hereinafter “United”) believes that in view
 23 of plaintiff’s claims, good cause exists for orthopedic and neurological examinations of the plaintiff in
 24 that the examinations will assist it in assessing and evaluating the orthopedic and neurological claims
 25 asserted by plaintiff, as well as her claims for special and general damages based upon those conditions;

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1 IT IS HEREBY STIPULATED, by and between plaintiff and United, through their counsel of
2 record, and pursuant to Rule 35 of the Federal Rules of Civil Procedure, as follows:

3 1. That the Court be requested to enter an order requiring plaintiff's attendance and
4 participation at the medical examinations described herein;

5 2. Plaintiff shall submit to a general orthopedic examination by Dr. Sampson in his office
6 located at 2299 Post Street, Suite 107, San Francisco, California, at 1:00 p.m. on June 7, 2012, or such
7 other date and time to be agreed upon by the parties. The examination shall include a functional soft
8 tissue examination and any and all other tests which are ordinarily deemed a part of a general orthopedic
9 examination.

10 3. Plaintiff shall also submit to a general neurological examination by Dr. Strassberg in his
11 office located at 2000 Van Ness Avenue, Suite 610, San Francisco, California, at 1:00 p.m. on May 17,
12 2012, or such other date and time to be agreed upon by the parties. The examination shall include motor
13 and sensory examinations and any and all other tests which are ordinarily deemed a part of a general
14 neurological examination.

15 4. The examinations will not include any blood draws, urine tests, x-rays, CT scans, MRIs or
16 any other radiographic studies.

17 5. The examinations may not include any diagnostic test or procedure that is painful,
18 protracted, or intrusive.

19 6. Plaintiff's counsel may record or may designate a representative to record the entire audio
20 content of the examination. Plaintiff's counsel shall inform defense counsel of the full names of any
21 persons who will be present with plaintiff at her examinations so that the examining doctors and their
22 staff may be informed in writing of their names and will authorize these persons to be present for the
23 examination in accordance with the examiners' practice of preserving the medical privacy rights of
24 patients.

25 7. The examinations will only be rescheduled or continued if an unavoidable medical
26 emergency occurs in which the doctor's medical expertise is required on an emergent basis. United's
27 counsel will immediately provide plaintiff's counsel with a full explanation of any emergent medical event
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1 should it occur and should it result in the need for the physician to reschedule plaintiff's examination or
2 leave plaintiff's examination prematurely.

3 8. United shall bear all costs of the examinations.

4 IT IS SO STIPULATED.

5 Dated: April 23, 2012

CODDINGTON, HICKS & DANFORTH

6
7 /s/ *Gina J. Allendorf*

8 By: _____

Gina J. Allendorf (*)
Attorneys for Defendant
UNITED AIR LINES, INC.

9
10
11
12 Dated: April 23, 2012

O'REILLY || COLLINS

13
14 /s/ *Matthew W. O'Reilly*

15 By: _____

16 Matthew W. O'Reilly
Attorneys for Plaintiff
CHRISTINE ALLEN

17 (*) I hereby attest that I have on file all holograph signatures
18 for any signatures indicated by a "conformed" signature (/s/)
19 within this e-filed document.

20 **ORDER**

21 The Court, having read and considered the foregoing stipulation, and good cause appearing, the
22 Court finds that the above-recited Stipulation is sanctioned by the Court, pursuant to Rule 35 of the
23 Federal Rules of Civil Procedure and shall be, and now is, the Order of the Court.

24 IT IS SO ORDERED.

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26 Dated: April 23, 2012

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Magistrate Judge Maria-Elena James
United States Magistrate Judge