

1 LAWRENCE S. VIOLA, ESQ.
 KAREN A. NERI, ESQ.
 2 VIOLA LAW FIRM
 441 First Avenue
 3 P.O. Box 1290
 4 San Mateo, CA 94401-1290
 Tel.: 650-343-6400
 5 Fax: 650-342-6854
 Attorneys for Plaintiffs
 6 OLGA SORENSEN and JAMES SORENSEN

7 GAIL C. TRABISH, ESQ. (SBN 103482)
 BOORNAZIAN, JENSEN & GARTHE
 8 A Professional Corporation
 555 12th Street, Suite 1800
 9 Oakland, CA 94607
 Telephone: (510) 834-4350
 10 Facsimile: (510) 839-1897

11 Attorneys for Defendant
 TARGET CORPORATION erroneously
 12 sued herein as "Target Corporation, dba
 Target #1122"
 13

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16

17 OLGA SORENSEN and JAMES)
 18 SORENSEN,)
)
 19 Plaintiff,)
)
 20 vs.)
)
 21 TARGET CORPORATION, dba Target)
 #1122 and Does 1-20)
)
 22 Defendants.)

Case No.: C12-04025 JCS

**STIPULATION TO CONDUCT A
 MEDICAL EXAMINATION OF
 PLAINTIFF OLGA SORENSEN**

 Complaint Filed: May 16, 2012

 [San Mateo County Superior Court Case
 No.: CIV513499]

25 Pursuant to Federal Rule of Civil Procedure 35, all parties to this action hereby stipulate
 26 and agree that Defendant TARGET CORPORATION shall be allowed to conduct a neurologic
 27 examination of plaintiff as follows:
 28

1 1. The examination will be conducted by Bruce McCormack, M.D., a licensed and
2 board certified neurosurgeon.

3 2. The examination will commence at **11:00 a.m. on December 18, 2013 at 2320**
4 **Sutter Street, Suite 202, San Francisco 94115.**

5 3. Dr. McCormack’s examination of plaintiff will include a physical examination and
6 other diagnostic tests that are not painful, protracted or intrusive. No radiographic studies will be
7 undertaken. The examination of plaintiff is to determine plaintiff’s medical condition, causation,
8 diagnosis and prognosis as it relates to the facts involved in the incident which gives rise to this
9 lawsuit. The examination may be attended by plaintiff’s representative.

10 4. Following the examination, defendant will provide plaintiff’s counsel with a copy
11 of the report of examination. By receiving this report or by deposing the examiner, plaintiff waives
12 any privilege she may have in this action concerning testimony about all examinations with respect
13 to the same condition, pursuant to Federal Rule of Civil Procedure 35(B)(4). Upon receipt of the
14 Independent Medical Examination report prepared by Dr. McCormack, plaintiff’s attorney will
15 provide defense counsel with the identity of all healthcare practitioners who have or will examine
16 plaintiff for the same condition and a copy of any reports which may exist or thereafter are
17 prepared.

18

19

DATED: September 12, 2013

VIOLA LAW FIRM

20

21

By: /s/ Karen A. Neri

LAWRENCE S. VIOLA, ESQ.
KAREN A. NERI, ESQ.
Attorneys for Plaintiffs
OLGA SORENSEN and
JAMES SORENSEN

22

23

24

25

26 ///

27 ///

28

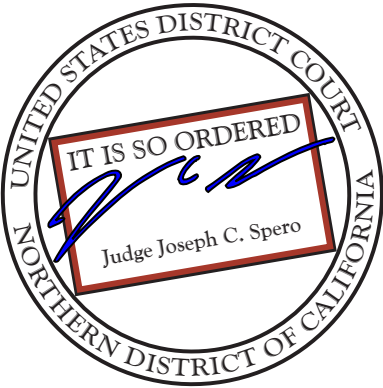
1 DATED: September 17, 2013

2 BOORNAZIAN, JENSEN & GARTHE
3 A Professional Corporation

4 By: /s/ Gail C. Trabish

5 GAIL C. TRABISH, ESQ.
6 Attorneys for Defendant
7 TARGET CORPORATION

8
9 Dated: 9/18/13



10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28