

JUSTICE FIRST, LLP

1 JUSTICE FIRST, LLP  
 Jenny C. Huang, SBN 223596  
 2 Briana Cummings, SBN 285002  
 3 180 Grand Avenue, Suite 1300  
 Oakland, CA 94612  
 4 Telephone: (510) 628-0695  
 E-mail: [jhuang@justicefirstllp.com](mailto:jhuang@justicefirstllp.com)  
 5 [bcummings@justicefirstllp.com](mailto:bcummings@justicefirstllp.com)

LEVY, VINICK, BURRELL, & HYAMS, LLP  
 Leslie F. Levy, SBN 104634  
 Jean K. Hyams, SBN 144425  
 180 Grand Avenue, Suite 1300  
 Oakland, CA 94612  
 Tel.: (510) 318-7700  
 Email: [leslie@levyvinick.com](mailto:leslie@levyvinick.com)  
[jean@levyvinick.com](mailto:jean@levyvinick.com)

6 Attorneys for Plaintiff Robin Love

7  
 8 MARION'S INN, LLP  
 Mark Palley, SBN 120073  
 9 David M. Rosenberg-Wohl, SBN 132924  
 Tanya G. Cecena, SBN 285186  
 10 1611 Telegraph Avenue, Suite 707  
 Oakland, CA 94612-2415  
 11 Telephone: (510) 451-6770  
 E-mail: [mp@marionsinn.com](mailto:mp@marionsinn.com)  
 12 [drw@marionsinn.com](mailto:drw@marionsinn.com)  
 13 [tgc@marionsinn.com](mailto:tgc@marionsinn.com)

14 Attorneys for Defendants Kaiser Foundation  
 Hospitals, Kaiser Foundation Health Plan, Inc.,  
 The Permanente Medical Group, Inc.

15  
 16 UNITED STATES DISTRICT COURT  
 17 NORTHERN DISTRICT OF CALIFORNIA

18 )  
 19 ROBIN LOVE, ) Case No.: 12-cv-05679 (WHO)(DMR)  
 20 ) Plaintiff, )  
 21 ) vs. ) **STIPULATION AND ORDER TO**  
 22 ) KAISER FOUNDATION HOSPITALS, ET ) **RELEASE MEDICAL RECORDS OF**  
 23 ) AL., ) **PATIENT J.T.**  
 24 ) Defendants. )  
 25 )

26 WHEREAS on December 26, 2013, Plaintiff Robin Love served her Third Set of  
 27 Document Requests seeking, among other documents, the medical records for Patient J.T. on  
 28 March 1, 2011;

1 WHEREAS Plaintiff contends that the documents requested are necessary to defend  
2 against allegations in her termination letter that in March 2011, she sent Patient J.T. to the  
3 hospital, unaccompanied, from her office on Sneath Lane to the facility on El Camino Real while  
4 he was actively suicidal;

5 WHEREAS Defendants objected that such medical records were private patient records  
6 subject to the requirements of Cal. Welf. & Inst. Code section 5328;

7 WHEREAS in a good faith effort to meet and confer on discovery disputes, the parties  
8 seek to resolve this matter without court intervention;

9 IT IS HEREBY STIPULATED AND AGREED that:

10 1. The medical records of Patient J.T. on March 1, 2011 (documents responsive to  
11 RFP No. 157) should be treated as "Confidential" records pursuant to the Amended  
12 Stipulated Protective Order [Docket No. 113] governing this case; and

13 2. The medical records of Patient J.T. on March 1, 2011 should be released by  
14 Defendants to Plaintiff solely pursuant to this Court's order, as indicated below.

15 **IT IS SO STIPULATED.**

16 Dated: January 29, 2014  
17 Oakland, California

**JUSTICE FIRST, LLP**  
Attorneys for Plaintiff Robin Love  
By:

18 /s/ Jenny Huang  
19 Jenny C. Huang  
20 180 Grand Avenue, Suite 1300  
Oakland, CA 94612

21 Dated: February 5, 2014  
22 Oakland, California

**MARION'S INN, LLP**  
Attorneys for Defendants  
By:

23 /s/ Tanya Cecena  
24 Tanya G. Cecena  
25 1611 Telegraph Avenue, Suite 707  
Oakland, CA 94612

26 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

27 Dated: February 6, 2014

  
28 \_\_\_\_\_  
THE HONORABLE DONNA M. RYU