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17 Attorneys for Defendants  
 GREGORY D. LEWIS; J. HALLOCK; K. MCGUYER; MATTHEW CATE AND  
 18 T.A. WOOD

19 UNITED STATES DISTRICT COURT  
 20 NORTHERN DISTRICT OF CALIFORNIA

21  
 22 RAYMOND J. MANZANILLO,

23 Plaintiff,

24 v.

25 GREGORY D. LEWIS, et al.,

26 Defendants.  
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Case No. 3:12-cv-05983-JST

**STIPULATION AND ~~PROPOSED~~ ORDER  
 TO DEPOSE PRISONER GEORGE  
 BLAKELEY**

1 Plaintiff Raymond Manzanillo (“Plaintiff”) and Defendants N. Brown, Gregory D. Lewis, J.  
2 Hallock, K. McGuyer, Matthew Cate, and T.A. Wood (“Defendants”) (collectively the “Parties”) by and  
3 through their counsel hereby stipulate and jointly request the Court order Prisoner George Blakeley to be  
4 deposed pursuant to Federal Rule of Civil Procedure 30(a)(2)(B).

5 On August 8, 2011 George Blakeley attacked Plaintiff in the SHU of the Pelican Bay State  
6 Prison. The incident between George Blakeley and Plaintiff on August 8, 2011 forms the crux of  
7 Plaintiff’s claims in this case. It is therefore necessary that Plaintiff have the opportunity to depose  
8 George Blakeley. The Parties have agreed that the deposition will take place at Folsom State Prison on  
9 Monday, July 11, 2016 commencing at 10:00 AM. Attached as Exhibit A is a copy of the draft  
10 subpoena and notice of deposition for Mr. Blakeley.

11 Federal Rule of Civil Procedure 30(a)(2)(B) requires leave of court for any deponent who is  
12 confined in prison. As such, the parties respectfully request the Court to grant Plaintiff leave to depose  
13 George Blakeley. A draft deposition subpoena is attached herein.

14 **IT IS SO STIPULATED.**

15 DATED: June 27, 2016

Respectfully submitted,

SEYFARTH SHAW LLP

18 By: /s/ James E. Barolo

19 Francis J. Ortman III  
20 Aryeh M. Hersher  
21 Jason M. Allen  
22 Michael A. Wahlander  
23 James E. Barolo

24 Attorneys for Plaintiff  
25 RAYMOND J. MANZANILLO  
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1 DATED: June 27, 2016

Respectfully submitted,

2 MCNAMARA LAW FIRM

3  
4 By: /s/ William Lee McCaslin

5 Peter Jon Hirsig  
6 William Lee McCaslin

7 Attorneys for Defendant  
8 N. BROWN

9 DATED: June 27, 2016

Respectfully submitted,

10 CALIFORNIA STATE ATTORNEY  
11 GENERAL'S OFFICE

12 By: /s/ Michael James Quinn

13 Michael James Quinn

14 Attorneys for Defendants  
15 GREGORY D. LEWIS; J. HALLOCK;  
16 K. MCGUYER; MATTHEW CATE AND  
17 T.A. WOOD

18 **ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)**

19 I, James E. Barolo, attest that concurrence in the filing of this stipulation has been obtained from  
20 the signatories, William Lee McCaslin and Michael James Quinn, counsel for Defendants.

21 Executed this 27th day of June 2016, in San Francisco, CA.

22 /s/ James E. Barolo

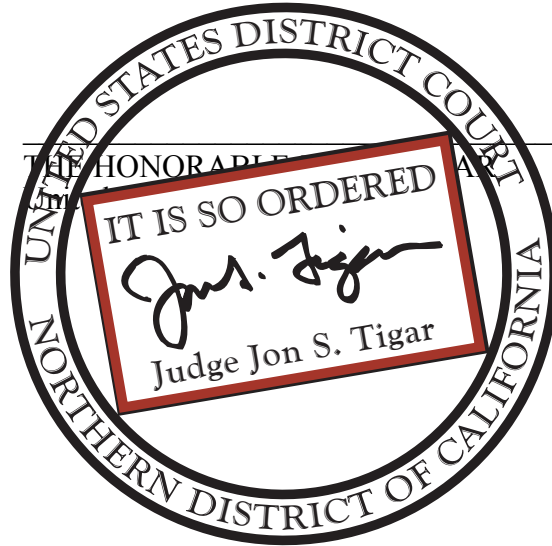
23 James E. Barolo

~~PROPOSED~~ ORDER

Pursuant to the Parties' stipulation and good cause appearing,

IT IS SO ORDERED.

Dated: June 28, 2016



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