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 10 IN THE UNITED STATES DISTRICT COURT  
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 12 SAN FRANCISCO DIVISION

14 **MICHELLE LAEL-B. NORSWORTHY,**  
 15  
 16 Plaintiff,  
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 18 **JEFFREY BEARD, et al.,**  
 19 Defendants.

C 14-00695 JST (PR)

**STIPULATION TO FILE DOCUMENT  
 UNDER SEAL AND ~~PROPOSED~~  
 ORDER**

Judge: The Honorable Jon S. Tigar

Action Filed: February 14, 2014

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1 At the case management conference held in this matter on May 13, 2015, Martin H. Dodd,  
2 counsel for J. Clark Kelso, the federal Receiver for the state prison medical care system, appeared  
3 and explained to the Court and parties that, on behalf of California Correctional Health Care  
4 Services, Network Providers, LLC had entered into an Agreement with Brownstein & Crane  
5 Surgical Services to provide a surgeon to perform the sex reassignment surgery ordered by the  
6 Court.

7 The Court requested that the Receiver file the contract with the Court. Because the  
8 Agreement contains a confidentiality provision, counsel for the Receiver requested an order  
9 permitting the Agreement to be filed under seal. The parties represented that they would stipulate  
10 to an order sealing the Agreement.

11 Accordingly, the parties hereby stipulate that the Agreement between Network Providers,  
12 LLC and Brownstein & Crane Surgical Services may be filed under seal.

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14  
15 Dated: May 14, 2015

/s/ Herman Hoying  
Herman Hoying, Esq.  
Morgan, Lewis & Bockius, LLP  
Counsel for Plaintiff

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19 Dated: May 14, 2015

/s/ Preeti K. Bajwa  
Preeti K. Bajwa, Deputy Attorney General  
California Department of Justice  
Counsel for Defendants

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22 Per the parties' stipulation, IT IS SO ORDERED.

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