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

**RODNEY JAMES QUINE,**

Plaintiffs,

**v.**

**BROWN, et al.,**

Defendants.

C 14-02726 JST

**STIPULATION AND ~~PROPOSED~~  
 ORDER FOR RULE 35 INDEPENDENT  
 MEDICAL EXAMINATION OF  
 PLAINTIFF**

Judge: The Honorable Jon S. Tigar  
 Trial Date: January 4, 2016  
 Action Filed: June 12, 2014

The Parties, having met and conferred, stipulate to the independent medical examination of  
 Plaintiff Rodney James Quine aka Shiloh Quine per Rule 35 of the Federal Rules of Civil  
 Procedure. The examination is to take place on Friday June 19, 2015, at Mule Creek State Prison,

1 at a mutually convenient time to be determined by the Parties and Mule Creek State Prison, by  
2 defendants' proposed expert witness, Dr. Richard Carroll, Ph.D. The independent medical  
3 examination will include a 2-3 hour clinical interview of Plaintiff regarding her gender identity  
4 dysphoria and her desire for sex-reassignment surgery and may include the Minnesota  
5 Multiphasic Personality Inventory - 2 (MMPI-2), the Millon Clinical Multiaxial Inventory - III  
6 (MCMI-III) Symptom Checklist, and the 90- Revised (SCL-90-R) Stress Inventory Sexual  
7 Response Questionnaire Sexual Fantasy Questionnaire

8 Plaintiff takes no position at this time with regard to whether Dr. Carroll is a "suitably  
9 licensed or certified" examiner under Rule 35 and the Parties agree that Plaintiff, by entering this  
10 stipulation, does not waive any right and expressly reserves all rights to challenge Dr. Carroll's  
11 qualifications and opinions. Counsel for Plaintiff will be permitted to be present for the initial  
12 introduction of Plaintiff to Dr. Carroll and present outside of the examination room but counsel  
13 for Plaintiff shall not be permitted to attend the examination.

14 Except as expressly noted, the Parties agree that the standard for a Rule 35 examination has  
15 been met.

16 SO STIPULATED, on June 2, 2015:

17  
18 /s/ Herman J. Hoying

19 \_\_\_\_\_  
HERMAN J. HOYING  
20 Attorney for Plaintiff  
Rodney James Quine aka Shiloh Quine

/s/ Preeti K. Bajwa

21 \_\_\_\_\_  
PREETI K. BAJWA<sup>1</sup>  
22 Deputy Attorney General  
Attorney for Defendants S. Pajong,  
23 J. Lewis, D. Bright, J. Beard, and J.  
24 Dunlap

25 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

26  
27 June 4, 2015  
28 Dated

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30 <sup>1</sup> Under Northern District General Order 45, subsection A.B., Defendant's counsel attests  
that Plaintiff's counsel's gave h34 permission to electronically sign this Stipulation on his behalf.

