

Selman Breitman LLP
ATTORNEYS AT LAW

1 GALINA KLETZER JAKOBSON (SBN 191227)
gjakobson@selmanbreitman.com
2 ERNEST D. FAITOS (SBN 119141)
efaitos@selmanbreitman.com
3 SELMAN BREITMAN LLP
33 New Montgomery, Sixth Floor
4 San Francisco, CA 94105-4537
Telephone: 415.979.0400
5 Facsimile: 415.979.2099

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7 Attorneys for Plaintiff TITAN INDEMNITY COMPANY,
A Texas Corporation

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10

11 TITAN INDEMNITY COMPANY, a Texas
12 corporation,

13 Plaintiff,

14 v.

15 A PLUS TOWING, a General Partnership;
JOSE HERMOSILLO, individually and dba A
16 PLUS TOWING; FERNANDO
HERMOSILLO, individually and dba A PLUS
17 TOWING; A PLUS TOWING, a business
organization form unknown, and KATRINA
18 RAPP, an individual, and DOES 1-10,

19 Defendants.
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Case No. 3:14-cv-03864-WHA

STIPULATION BETWEEN PLAINTIFF
TITAN INDEMNITY COMPANY AND
DEFENDANT KATRINA RAPP
REGARDING COORDINATION OF
DEPOSITIONS, AND [~~PROPOSED~~] ORDER

21 IT IS HEREBY STIPULATED by and between plaintiff Titan Indemnity Company, by
22 and through its attorney of record, Galina Kletzer Jakobson, Esq. of Selman Breitman LLP, and
23 defendant Katrina Rapp, by and through her attorney of record, Martin T. Reilley, Esq. of
24 Krankemann Law Offices, pursuant to Federal Rules of Civil Procedure, Rule 29 authorizing the
25 parties to stipulate to modify procedures regarding discovery, except in the extension of
26 deadlines, and in the interest of maximizing efficiency, and reducing the time and costs
27 necessary to complete discovery in this action:
28


1 1. That the depositions of Jose Hermosillo, Sr., Jose Hermosillo, Jr., Fernando
2 Hermosillo, Eugene Roberson, and Katrina Rapp may be taken simultaneously with, and in
3 conjunction with the depositions of the same individuals in the State Court action of *Katrina*
4 *Rapp v. A Plus Towing, et al.*, Superior Court of California, County of Sonoma, Case No.
5 255299. The stipulating parties agree that the aforementioned five depositions shall be taken
6 pursuant the California Code of Civil Procedure provisions that govern before whom depositions
7 may be taken, the time and place of depositions, and the notice and manner of depositions.

8 2. The stipulating parties agree that the aforementioned five depositions may be used
9 for all pretrial and trial-related purposes in this, the above entitled federal court action, without
10 objection by any party based on the fact that the depositions were taken pursuant to the
11 California Code of Civil Procedure.

12 3. The stipulating parties preserve all other objections and rights pursuant to the
13 Federal Rules of Civil Procedure, the Federal Rules of Evidence, the California Code of Civil
14 Procedure, and the California Rules of Evidence to the use of these depositions at trial based on
15 relevance and privilege.

16
17 DATED: December 30, 2014


SELMAN BREITMAN LLP

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20 By: 
21 GALINA K. JAKOBSON
22 ERNEST D. FAITOS
23 Attorneys for Defendant Katrina Rapp
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DATED: December 30, 2014


KRANKEMANN LAW OFFICES

By: 
MARTIN T. REILLEY
Attorneys for Defendant Katrina Rapp

ORDER

Upon Stipulation of the parties and good cause appearing therefore,
IT IS SO ORDERED.

DATED: December 31, 2014.

By: 
William Alsup
United States District Judge