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9 Attorneys for Plaintiff James Neuroth

10 **UNITED STATES DISTRICT COURT**  
 11 **NORTHERN DISTRICT OF CALIFORNIA**

12 JAMES NEUROTH, Individually and as Successor in )  
 13 Interest of Decedent STEVEN KELLOGG NEUROTH, ) No: 3:15-cv-03226-RS (RMI)  
 14 )  
 15 Plaintiff, )  
 16 vs. )

17 MENDOCINO COUNTY, a public entity; )  
 18 MENDOCINO COUNTY SHERIFF-CORONER )  
 19 THOMAS D. ALLMAN, in his individual and official )  
 20 capacities; CORRECTIONS CAPTAIN TIM PEARCE; )  
 21 SERGEANT LORI KNAPP; DEPUTY FRANK )  
 22 MASTERSON; DEPUTY CRAIG BERNARDI; )  
 23 DEPUTY MICHAEL GRANT; DEPUTY JEANETTE )  
 24 HOLUM; DEPUTY ROBERT PAGE; DEPUTY )  
 25 CHRISTINE DE LOS SANTOS; CITY OF WILLITS, a )  
 26 public entity; WILLITS POLICE CHIEF GERARDO )  
 27 GONZALEZ; WILLITS POLICE OFFICER JEFF )  
 28 ANDRADE; WILLITS POLICE OFFICER KEVIN )  
 LEEF; CALIFORNIA FORENSIC MEDICAL GROUP, )  
 INCORPORATED, a California corporation; )  
 CORRECTIONAL MEDICAL GROUP COMPANIES, )  
 INCORPORATED, a Delaware Corporation; TAYLOR )  
 FITHIAN, M.D.; ELAINE HUSTEDT; YVONNE )  
 MAXFIELD, R.N.; CLAIRE TESKE, R.N.; JENNIFER )  
 L. CAUDILLO, L.V.N., and COUNTY DEPUTIES )  
 DOES 9–20, and DOES 23–35, individually, jointly, and )  
 severally, )  
 Defendants. )

**STIPULATION AND  
 (PROPOSED) ORDER FOR  
 FORENSIC EXAMINATION  
 OF PERFORMANCE  
 EVALUATIONS OF  
 DEFENDANT JENNIFER  
 CAUDILLO**

1  
2 Plaintiff and Defendants CMGC, Taylor Fithian, M.D., Elaine Hustedt, and Claire Teske,  
3 R.N., by and through their respective attorneys of record, hereby stipulate to the following order  
4 being issued in this matter, after meeting and conferring about the forensic examination of  
5 performance evaluations of Jennifer Caudillo, LVN::

6 1. The office of Peter Bertling, Counsel for Defendants CMGC, Fithian, Hustedt, and  
7 Teske, shall send what may be all original performance evaluations for Jennifer Caudillo by  
8 Federal Express on November 20, 2017, to Plaintiff's document examiner:

9 Erich Speckin  
10 Speckin Forensic Laboratories  
11 110 East Broward Boulevard, Suite 1700  
12 Fort Lauderdale, FL 33301  
13 (954) 763-6134

14 2. Mr. Speckin will conduct forensic testing on the documents that may include:  
15 microscopic, infrared and ultraviolet light, ESDA testing for impressions, ink testing of a small  
16 sample of ink, all of which is generally accepted forensic document examination, which will not  
17 harm the legibility or evidentiary value of the document, and will not harm anyone else's ability to  
18 test the documents. Upon completion of the testing, Mr. Speckin will return the documents to Mr.  
19 Bertling by Federal Express with a sworn verification stating he has received the documents and is  
20 returning them to Mr. Bertling.

21 3. Plaintiff and the Defendants represented by Mr. Bertling shall have until December  
22 29, 2017, to exchange any Rule 26 expert reports concerning the forensic examination of the  
23 Caudillo performance evaluations.

24 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.  
25  
26  
27  
28

1 Dated: November 19, 2017

**HADDAD & SHERWIN LLP**

2 */s/ Julia Sherwin*

3 \_\_\_\_\_  
4 JULIA SHERWIN  
Attorneys for Plaintiff

5 Dated: November 19, 2017

**BERTLING & CLAUSEN LLP**

6 */s/ Peter G. Bertling*

7 \_\_\_\_\_  
8 PETER G. BERTLING  
9 Attorneys for Defendants CORRECTIONAL  
10 MEDICAL GROUP COMPANIES, INC.;  
ELAINE HUSTEDT; TAYLOR FITHIAN,  
M.D.; CLAIRE TESKE, R.N.

11 \*Mr. Bertling gives his permission to file this document with his electronic signature.

12  
13  
14 **(PROPOSED) ORDER**

15 PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING, IT IS SO  
16 ORDERED.

17  
18 Dated: November 20, 2017

19 \_\_\_\_\_  
20 Hon. Robert M. Illman  
UNITED STATES MAGISTRATE JUDGE