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

LES FIELDS/C.C.H.I. INSURANCE SERVICES, a
California Corporation,

Plaintiff,

vs.

STUART M. HINES, an individual, DEBORAH
CANADAS, an individual, RISK MANAGEMENT
AND REINSURANCE SERVICES, INC., a
California Corporation, INTERREMEDY
INSURANCE SERVICES, LLC, a California
Limited Liability Company, and DOES 1 through 99,
inclusive,

Defendants.

Case No.: 15-cv-03728 MEJ

**“REVISED” NOTICE OF JOINT
STIPULATION RE: MOTIONS IN
LIMINE**

Due Date: June 5, 2017
Courtroom: C, 15th Floor
Magistrate Judge: Hon. Maria-Elena James

Trial Date: October 16, 2017

**TO THE HONORABLE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA, AND ALL PARTIES AND TO THEIR
ATTORNEYS OF RECORD HEREIN:**

PLEASE TAKE NOTICE that under the Court’s Orders dated May 8, 2017 (Dkt. No. 124)

1 and May 31, 2017 (Dkt. No. 132), Plaintiff Les Fields/C.C.H.I. Insurance Services, a California
2 corporation (“CCHI”), by its counsel files the following “*Revised*” Joint Stipulation:

3 **MOTIONS IN LIMINE (“MILs”) FILED BY EACH PARTY**

4 **CCHI’s MILs –**

5 **MIL #1:** EXCLUDE TAX MATTERS (Dkt. No. 117)

6 **MIL #2:** EXCLUDE LES’ ESTATE PLANNING & STOCKHOLDER INFO (Dkt. No. 118)

7 **MIL #3:** EXCLUDE EMPLOYEE THEFT INSURANCE & RECOVERY (Dkt. No. 119)

8 **MIL #4:** STRIKE DEFENDANTS’ BOILERPLATE AFFIRMATIVE DEFENSES (Dkt. No. 121)

9 **MIL #5:** JURY QUESTIONNAIRE (Dkt. No. 122)

10 **Defendant Hines’ MILs –**

11 **MIL #1:** EXCLUDE OPINION TESTIMONY OF LAY WITNESS MICHAEL NEALY
12 REGARDING LIABILITY AND DAMAGES (Dkt. No. 106)

13 **MIL #2:** EXCLUDE EVIDENCE OF THE CLAIMS AND CAUSES OF ACTION THAT ARE
14 BARRED BY THE COURT ORDER RE: DEFENDANTS' MOTIONS FOR SUMMARY
15 JUDGMENT (Dkt. No. 108)

16 **MIL #3:** EXCLUDE EVIDENCE OF PREJUDICIAL VOICE MAIL RECORDING (Dkt. No. 110)

17 **MIL #4:** EXCLUDE EVIDENCE OF CCHI'S RECEIPT OF PAYMENTS FROM EMPLOYEE
18 THEFT INSURERS (Dkt. No. 111)

19 **MIL #5:** EXCLUDE MICHAEL A. NEALY'S ACCOUNTING REPORTS AS INADMISSIBLE
20 HEARSAY EVIDENCE (Dkt. No. 113)

21 **MIL #6:** EXCLUDE EVIDENCE OF ALLEGED UNFAVORABLE FACTS REGARDING
22 STUART HINES (Dkt. No. 115)

23 **MIL #7:** EXCLUDE EVIDENCE THAT PLAINTIFF FAILED TO DISCLOSE PURSUANT TO
24 RULE 26 (Dkt. No. 116)

25 **InterRemedy Defendants’MIL -**

26 **MIL #1:** EXCLUDE EVIDENCE BEYOND THE SCOPE OF THE COURT’S MSJ ORDER
27 (Dkt. No. 120)

1 Dated: June 5, 2017

/s/ James G. Lucier

2 By: _____
3 James G. Lucier, Attorney for Defendant
4 Stuart M. Hines

5 Dated: June 5, 2017

/s/ Christopher L. Aguilar

6 By: _____
7 Christopher L. Aguilar, Attorney for Defendants
8 Interremedy Insurance Services, LLC, Deborah
9 Canadas, Joyce Sykes McGuire, and Kim Willoughby

10 **SO ORDERED** this 6th day of June 2017.



11 _____
12 Maria-Elena James, Magistrate Judge

