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7 Attorneys for Defendant MARRIOTT HOTEL SERVICES, INC.
(erroneously sued as MARRIOTT INTERNATIONAL, INC.)

8 UNITED STATES DISTRICT COURT
9
10 NORTHERN DISTRICT OF CALIFORNIA

11 JESSICA I. LOPEZ,

12 Plaintiff,

13 v.

14 MARRIOTT INTERNATIONAL, INC.,
15 individually; DOES 1-50 inclusive,

16 Defendants.

) Case No.: 3:15-cv-04277-SI

) Trial Date: January 17, 2017

) [ORIGINALLY SAN FRANCISCO COUNTY
) SUPERIOR COURT, CASE NO. CGC 15-547443]
) State Court Action Filed: August 18, 2015

) **PROPOSED ORDER COMPELLING
) KAISER PERMANENTE TO COMPLY WITH
) SUBPOENA FOR MEDICAL RECORDS OF
) JESSICA I. LOPEZ**

17
18 On April 15, 2016, this matter came before the Court on Defendant, Marriott Hotel Services,
19 Inc.'s (erroneously sued as Marriott International, Inc.) ("Defendant") request for the disclosure of
20 Plaintiff's Jessica I. Lopez ("Plaintiff") medical records from Kaiser Permanente. Counsel for
21 Plaintiff and Defendant were present.

22 Whereas, Plaintiff and Defendant agree to the issuance of the attached subpoena and
23 attachment thereto. The Court hereby issues this ORDER compelling Kaiser Permanente to comply
24 with the attached subpoena.

25 IT IS SO ORDERED.

26 Date: 4/19/16

27 By:



Hon. Susan Illston, District Court Judge

28 4835-0393-5280, v. 1

UNITED STATES DISTRICT COURT

for the

Northern District of California

Jessica I. Lopez

Plaintiff

v.

Marriott International, Inc.

Defendant

Civil Action No. 3:15-cv-04277-SI

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Kaiser San Francisco, Attn: Release of Informatin Department, 2238 Geary Blvd., 7th Floor
San Francisco, CA 94115

(Name of person to whom this subpoena is directed)

Production: **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:
Please see Attachment 1.

Place: Nationwide Legal, LLC, 1609 James M. Wood Blvd., 2nd Floor, Los Angeles, CA 90015	Date and Time: 05/23/2016 10:00 am
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Inspection of Premises: **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 04/18/2016

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendant

Marriott Hotel Services, Inc., who issues or requests this subpoena, are:

Marion Cruz, Esq. SBN: 244223, Kaufman Dolowich & Voluck, LLP, 425 California Street, Suite 2100, San Francisco, CA 94104
(415) 926-7600

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

ATTACHMENT 1

Jessica I. Lopez v. Marriott International, Inc.

United States District Court – Northern District of California

Case No. 3:15-cv-04277-SI

DEFINITIONS

“DOCUMENT” refers to any “writing,” “recording,” “photograph,” “original,” and “duplicate” as defined by Federal Rule of Evidence Code 1001.

“RELATING TO” as used herein, shall be deemed to be a request for any DOCUMENT supporting, reflecting, referring to, embodying, continuing, constituting, identifying, stating, dealing with, evidencing or in any way relevant to the described subject matter of the category of documents requested, or any portion thereof.

DOCUMENTS TO BE PRODUCED

RELATING TO:

NAME:	Jessica I. Lopez
DOB:	January 31, 1991
SSN:	xxx-xx-3082

Any and all DOCUMENTS (including history, findings, charts, doctors’ notes, nurses’ notes, diagnoses, prognoses, consulting physicians’ reports, therapy reports, operative reports, diagnostic reports, pathology reports, treatment rendered, prescriptions ordered and all other pertinent records and reports) RELATING TO the medical treatment, examination, and consultation of **Jessica I. Lopez** (DOB: 1/31/1991) for any medical and psychological injury or medical condition resulting from sexual battery or sexual harassment as well as for any medical and psychological injury or medical condition related to depression, chest pains, inability to sleep, stress, anxiety, emotional distress, and, including but not limited to, treatment, examination, and consultation by Dr. Joseph Leung, and LMFP Sally Evans, also known as Sally Louise, and any other treaters or staff members at Kaiser Permanente.

Any and all documents relating to billings and payments made in connection to the above-described treatment, examination, and consultation.

Said DOCUMENTS are regulated by Exhibit A, the signed COURT ORDER COMPELLING KAISER PERMANENTE TO COMPLY WITH THIS SUBPOENA.