

Neal & Associates

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5 Attorneys for Rita Harris, Individually and as  
Trustee of the Gilbert T. Harris and Rita E. Harris Living Trust U/A 07/03/90,  
6 and as Trustee of the Rita E. Harris Trust U/A 10/03/03.

7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA  
9 OAKLAND BRANCH

10 ROY T. CAVELLINI, MARLENE ) Case No. C-93-0057 SBA (KAW)  
MOREHEAD and KANDY RENARD )  
11 WILSON ) **STIPULATION AND ORDER RE RITA**  
) **HARRIS’ MOTION FOR PROTECTIVE**  
12 ) **ORDER OR ALTERNATIVELY TO QUASH**  
Plaintiffs, ) **AND JUDGMENT CREDITORS’ MOTION**  
) **TO COMPEL**  
13 vs. )  
)  
14 MICHAEL F. HARRIS, ) Date:  
) Time:  
15 ) Courtroom:  
Defendant. )  
16 )  
\_\_\_\_\_ )

17  
18 WHEREAS, on February 12, 2014, Neal & Associates filed a Motion For Protective Order or  
19 Alternatively to Quash Subpoena served by Plaintiffs and Judgment Creditors (“Plaintiffs”) upon  
20 Neal & Associates, Custodian of Records for Rita Harris, and on March 17, 2014, Plaintiffs filed an  
21 Opposition to Non-Party Neal & Associates Motion to Quash Subpoena Duces Tectum; and a Cross-  
22 Motion to Compel Production Motion to Compel,

23 IT IS HEREBY STIPULATED AND AGREED between the parties that:

24 1. Neal & Associates and Plaintiffs respectfully request that the Court stay its decision  
25 on either Motion in exchange for Neal & Associates agreement to produce, by April 4, 2014, 1) the  
26 complete Gilbert T. Harris and Rita E. Harris Living Trust and the Rita E. Harris Trust, including all  
27

28 1.

STIPULATION AND ORDER RE RITA HARRIS’ MOTION FOR PROTECTIVE ORDER OR  
ALTERNATIVELY TO QUASH AND JUDGMENT CREDITORS’ MOTION TO COMPEL

1 amendments thereto; and 2) a more detailed privilege log. As Neal & Associates and Plaintiffs  
2 continue to dispute the applicability of any privilege to the communications between Neal &  
3 Associates and Michael Harris during the period that he was the co-trustee of the Rita Harris Trust,  
4 the privilege log must include sufficient information to enable Plaintiffs to determine whether Neal  
5 & Associates claim of privilege for a specific document is based upon Michael Harris' status as co-  
6 Trustee at the time of the communication.

7 2. By entering into this Stipulation, both Neal & Associates and Plaintiffs reserve all  
8 rights to pursue their respective Motions should they later fail to agree on the scope of documents to  
9 be produced under Plaintiffs' subpoena.  
10

11 IT IS SO STIPULATED.

12 Dated: March 24, 2014

NEAL & ASSOCIATES

13 By: /s/ Howard D. Neal  
14 Howard D. Neal  
15 Attorney for Non-Party Rita Harris  
16

17 Dated: March 24, 2014

LAW OFFICE OF GEOFFREY V. WHITE

18 By: /s/ Geoffrey V. White  
19 Geoffrey V. White  
20 Attorney for Plaintiffs  
21

22 IT IS SO ORDERED.

23 Dated: March <sup>25</sup>~~24~~, 2014

24 By: Kandis Westmore  
25 Judge Kandis A. Westmore  
26 Magistrate Judge, United States District  
27 Court  
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