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9 Attorneys for Defendants  
 GLOBAL WINE COMPANY and JOHN DAVIS

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA

13	KIMBERLEY ROSS,	)	Case No.: 09-CV-06107-CW
		)	
14	Plaintiff,	)	<b>STIPULATION RE: MENTAL</b>
		)	<b>EXAMINATION; ORDER</b>
15	vs.	)	
		)	Case Filed: December 31, 2009
16	GLOBAL WINE COMPANY and	)	
	JOHN DAVIS,	)	
17		)	
	Defendants.	)	
18	_____	)	

19  
 20 The parties stipulate to the following:

21 A. Plaintiff will submit to a Comprehensive Psychiatric Examination (IME) by John  
 22 Greene, M.D. The examination will be limited to an evaluation of plaintiff's claimed emotional  
 23 distress. The examination will consist of two parts:

- 24 1) An oral examination, including:
  - 25 i. taking a complete history (Family History, Educational History, Social
  - 26 History, Past Medical History, Past Psychological/Psychiatric History,
  - 27 Employment, Legal History, the Incident, Subsequent Clinical Course
  - 28 and Psychological/Psychiatric Treatment); and

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- ii. an oral mental status examination (specific questions to assess mental functioning, mood, affect, capacity for abstraction, judgment, etc.).
- 2) The administration of three psychological test instruments:
- i. The MMPI-2 (Minnesota Multiphasic Personality Inventory – 2);
  - ii. The MCMI-III (Millon Clinical Multiaxial Inventory – III); and
  - iii. The Rotter Incomplete Sentences Blank.

The estimated time for the Comprehensive Psychiatric Examination (IME) is 4-6 hours: 2-3 hours for the oral examination, and 2-3 hours for the psychological testing – depending on the examinee’s pace.

No one other than the examinee is entitled to be present during the examination (per C.C.P. 2032.530(b), as well as *Edwards v. Superior Court* (1976) 16 Cal. 3d 905, 911-912 and *Vinson v. Superior Court* (1987) 43 Cal. 3d 833, 845-846).

Dated: March \_\_, 2011

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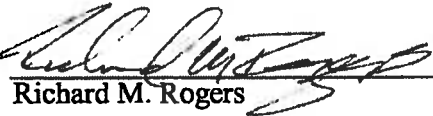
By:   
\_\_\_\_\_  
Madonna A. Herman

Attorneys for Defendant,  
GLOBAL WINE COMPANY and  
JOHN DAVIS

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Dated: March 16, 2011

**LAW OFFICES OF RICHARD M. ROGERS**

By:   
Richard M. Rogers

Attorneys for Plaintiff,  
KIMBERLEY ROSS

IT IS SO ORDERED.

Date: 3/31/2011

  
United States District Judge