

1 The parties to the above-captioned action, through their respective counsels, jointly
2 submit this Certification that Counsel for plaintiff and defendants have met and conferred as to
3 each issue raised by the Motions In Limine presented to this Court, pursuant to Judge
4 Armstrong's September 21, 2012 Standing Order, and the February 14, 2013 Order Striking
5 Plaintiff's Motions In Limine.
6

7 On February 15, 2013, attorney George S. Khoury, for plaintiff, and attorneys Tyler
8 Paetkau and Olga Savage, for defendants, did meet and confer as to each and every issue raised
9 in the respective motions in limine. Counsel discussed each issue in good faith, and attempted to
10 resolve each issue informally.
11

12 In discussing the issues, counsel were able to agree to, and hereby stipulate that:

13 1.) Defendants will not mention, or seek to introduce into evidence, information that
14 relates to plaintiff CRAIG YATES receipt of disability benefits and social security.
15

16 2.) Plaintiff will not mention, or seek to introduce into evidence, information relating
17 to how plaintiff CRAIG YATES became disabled.

18 Respectfully submitted,

19 Dated:

20 THOMAS E. FRANKOVICH,
21 ***A PROFESSIONAL LAW CORPORATION***

22 By: /s/ George S. Khoury _____
23 Thomas E. Frankovich
24 George S. Khoury
25 Attorneys for Plaintiff CRAIG YATES

26 ///
27 ///
28 ///
///

1 Dated:

HARTNETT, SMITH & PAETKAU

2
3 By: /s/ Tyler Paetkau

4 Tyler Paetkau

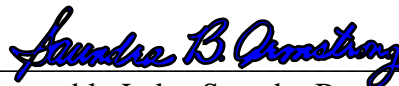
Olga Savage

5 Attorneys for Defendants SWEET POTATO
6 ENTERPRISE, INC., a California Corporation dba
7 POPEYES STORE # 2794; and KUAN L. NG and
8 HELEN L. NG, Trustees, of THE KUAN L. NG
AND HELEN L. NG REVOCABLE TRUST OF
1993

9
10
11 **ORDER**

12 **IT IS SO ORDERED** that pursuant to the stipulation of the parties: 1.) defendants shall
13 not mention, or seek to introduce into evidence, at trial, information that relates to plaintiff
14 CRAIG YATES receipt of disability benefits and social security; and 2.) plaintiff shall not
15 mention, or seek to introduce into evidence, at trial, information relating to how plaintiff CRAIG
16 YATES became disabled.
17

18 Dated: 2/19/13

19
20 

21 Honorable Judge Sandra Brown Armstrong
22 United States District Court, Northern District
23 of California
24
25
26
27
28