

TRIMBLE, SHERINIAN & VARANINI

2500 VENTURE OAKS WAY, SUITE 350 • P.O. BOX 590 95812-0590
SACRAMENTO, CALIFORNIA 95833
TELEPHONE (916) 313-7516 FACSIMILE (916) 442-5750
E-Mail jvaranini@tsvlaw.com

JEROME M. VARANINI-Direct Line (916) 313-7509

February 24, 2012

Chief Magistrate Judge Maria-Elena James
United State District Court
Courtroom B, 15th Floor
450 Golden Gate Avenue
San Francisco, California 94102

Re: Hatfield v. County of Lake, et al.
Case No.: 11-2396

Dear Chief Magistrate James:

The undersigned represents the following defendants in this matter: the California Forensic Medical Group, Inc. ("CFMG"), Robin Briggs, L.V.N., K.C. Grigsby, FNP, and Fairin Antonio, L.V.N. This case is currently set for an early settlement conference on March 9, 2012.

This letter is to request permission from the court for telephone standby for nursing defendants Grigsby, Antonio, and Briggs. A representative from defendant CFMG with full authority for CFMG will attend the settlement conference as will a representative of the insurance carrier for the defendants.

Although there have been multiple depositions taken by plaintiffs' counsel and counsel for the co-defendants in anticipation of this early settlement conference, the only jail medical defendant to have been deposed has been LVN Robin Briggs. Ms. Briggs had contact with the decedent after he had been booked at the jail and after noting that he had been treated for a broken arm and cleared for incarceration by Adventist Clearlake Hospital, Ms. Briggs asked the hospital to fax a copy of the records so that the records would be in the chart to be used as deemed appropriate by the mid-level provider, the FNP, who would be following the patient's orthopedic status at the jail. Mr. Hatfield subsequently committed suicide.

Apparently the theory as to Ms. Briggs is that she did not read the hospital chart that she had placed in the chart for the FNP's use. It is unknown at this point what the theory of the case is as to nurse Antonio or FNP Grigsby. In any event, this request is made both for the convenience of the court in terms of the numbers of persons to attend the MSC as well as with the knowledge that representatives from CFMG and the carrier will be present fully prepared to participate in the MSC.

Very truly yours,

/s/ Jerome M. Varanini

JEROME M. VARANINI

JMV:jm
cc: All counsel via ECF

February 24, 2012
Page 2

~~[PROPOSED]~~ ORDER GRANTING TELEPHONIC APPEARANCE

I hereby grant telephonic appearance for nursing defendants Robin Briggs, L.V.N., K.C. Grigsby, FNP, and Fairin Antonio, L.V.N.

Dated: 3/6/12 _____



Honorable Judge Maria-Elena James