1	Daniel L. Feder (SBN 130867)	
2	THE LAW OFFICES OF DANIEL FEDER 332 Pine St., Ste .700	
3	San Francisco, CA 94104 Tel.: (415) 391-9476	
4	Fax: (415) 391-9432 E-mail: danfeder@pacbell.net	
5	Attorneys for Plaintiff	
6	BELENCIA WASHINGTON	
7	Robert M. Pattison (State Bar No. 103528) JACKSON LEWIS P.C.	
8	50 California Street, 9th Floor San Francisco, California 94111-4615	
9	Telephone: (415) 394-9400 Facsimile: (415) 394-9401	
10	E-mail: <u>pattisonr@jacksonlewis.com</u>	
10	Attorneys for Defendants	
11	KINDRED HEALTHCARE, INC. and KINDRED NURSING CENTERS WEST, LLC	
	UNITED STATES	DISTRICT COURT
13		
14	NORTHERN DISTR.	ICT OF CALIFORNIA
15		
16	BELENCIA WASHINGTON, an individual,	Case No. 4:15-cv-04528-KAW
17	Plaintiff,	STIPULATION AND [PROPOSED] FEDERAL RULE OF EVIDENCE 502(d)
18	v.	ORDER
19	KINDRED HEALTHCARE, INC., a Delaware Corporation; KINDRED NURSING	Complaint Filed: 10/01/2015
20	CENTERS WEST, LLC, a limited liability Corporation,	Trial Date: None Set
21		
22	Defendants.	
23	///	
24	///	
25	///	
26	///	
27	///	
28		
	STIPULATION AND [PROPOSED] FEDERAL	1
	RULE OF EVIDENCE 502(d) ORDER	Case No. 4:15-cv-04528-KAW

1	To facilitate discovery in this matter, the parties respectfully request the Court enter the		
2	following order pursuant to Federal Rule of Evidence 502(d):		
3	The production of privileged or work-product protected documents, electronically stored		
4	information ("ESI") or other information, whether inadvertent or otherwise, is not a waiver of the		
5	privilege or protection from discovery in this case or in any other federal or state proceeding. This		
6	Order shall be interpreted to provide the maximum protection allowed by Federal Rule of		
7	Evidence 502(d). Nothing contained herein is intended to or shall serve to limit a party's right to		
8	conduct a review of documents, ESI or information (including metadata) for relevance,		
9	responsiveness and/or segregation of privileged and/or protected information before production.		
10	0 IT IS SO STIPULATED.		
11	1 Dated: July 28, 2016 THE LAW OFFICES OF DANIEL	FEDER	
12	2		
13			
14			
15	5 BELENCIA WASHINGTON		
16	6 Dated: July 28, 2016 JACKSON LEWIS P.C.		
17	7		
18	8 By: /s/ Robert M. Pattison		
19	Attomass for Defendents	CES	
20	INC. and VINDED NUDSING OF		
21			
22	[PROPOSED] ORDER		
23	3 IT IS SO ORDERED.		
24	4		
25			
26	6 Hohorable Kandis A. Westmore United States Magistrate Judge		
27	7		
28	8 4848-0666-0405, v. 1		
	2 STIPULATION AND [PROPOSED] FEDERAL		
	RULE OF EVIDENCE 502(d) ORDERCase No. 4:15-cv-0452	3-KAW	