

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY and STATE
FARM FIRE AND CASUALTY
COMPANY,

Plaintiffs,

v.

PETER J. HANSON, P.C. D/B/A HANSON
CHIROPRACTIC and PETER J. HANSON,

Defendants.

No. 2:16-cv-01085-RSL

**STIPULATED ORDER REGARDING
PLAINTIFFS' MOTION TO COMPEL**

**NOTE ON MOTION CALENDAR:
SEPTEMBER 5, 2017**

Plaintiffs State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company ("State Farm Plaintiffs") and Defendants Peter J. Hanson, P.C. d/b/a Hanson Chiropractic and Peter J. Hanson ("Hanson Defendants") stipulate and agree that in exchange for withdrawal of the State Farm Plaintiffs' Motion to Compel (Dkt. No 57), the Hanson Defendants will undertake the following measures:

1. Hanson Defendants shall retain third-party vendor eDiscovery Inc. to collect and produce, in a forensically sound manner, Hanson Chiropractic's complete patient files for the at-

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1 issue patients listed in SF00173980ROD – SF00173984PROD (adult patients) and
2 SF00173990PROD – SF00173991PROD (minor patients) at Defendants' expense. Complete
3 patient files includes but is not limited to any intake forms, correspondence, medical records,
4 billing documents or other documentation concerning any treatment, services, or products
5 provided by Defendants to the at-issue patients from January 1, 2009 to the present. This includes
6 treatment, services, and/or products relating to auto accident injuries as well as non-auto accident-
7 related care. The complete patient files must be produced to the State Farm Plaintiffs within 30
8 days of this Order.

9 2. Hanson Defendants shall retain third-party vendor eDiscovery Inc. to collect and
10 produce, in a forensically sound manner, certain emails at Defendants' expense. Responsive
11 emails must be produced to the State Farm Plaintiffs within 30 days of this Order. The email
12 collection will include the following email accounts: chiropete@comcast.net;
13 drhanson@hansonchiro.com; newpatientassistant@gmail.com;
14 frontdesk.hansonchiro@gmail.com; tn0446@gmail.com; ryanwoodburydc@aol.com;
15 sglinesdc@gmail.com; jwaldropdc@hotmail.com; tatyana.chiro@gmail.com;
16 kayla.chiro@gmail.com; tina.hansonchiro@gmail.com; ipcoach.hansonchiro@gmail.com;
17 edward.chiro@gmail.com; stevie.chiro@gmail.com; and any other email accounts used by current
18 Hanson Chiropractic employees or contractors to communicate regarding Hanson Chiropractic
19 patients during the time period January 1, 2009 to the present. Email documents (including any
20 attachments) that pertain or relate to any of the following shall be produced:

- 21 a. The at-issue patients listed in SF00173980ROD – SF00173984PROD (adult
22 patients) and SF00173990PROD – SF00173991PROD (minor patients), including
23 but not limited to communications with patients, referral sources, attorneys, or other
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1 health care providers, as well as communications relating to patient intake,
2 treatment, billing and payment;

3 b. free or discounted services and write-offs (including any related marketing or
4 advertising); and


5 3. The parties agree to use Allison Goodman of eDiscovery Inc. as the forensic
6 examiner and both plaintiffs and defendants must work cooperatively with the third party forensic
7 vendor on an agreed process for identifying, collecting, and producing documents within the
8 timeframes specified in this Order.

9 4. Hanson Defendants shall produce all documents reflecting free or discounted
10 services offered or provided to non-automobile insurance patients and write-offs, discounts, and/or
11 fee reductions applied to non-automobile insurance patients within 14 days of this Order. If
12 Defendants previously produced responsive documents, they must identify by Bates number the
13 documents responsive to each request. The documents described in this paragraph do not include
14 patient-specific documents (i.e., an itemized billing statement for a particular patient) for patients
15 who are not at-issue in this lawsuit.

16 5. The State Farm Plaintiffs may conduct up to four depositions (including re-opening
17 the deposition of any persons already deposed) concerning information reflected in the documents
18 ordered to be produced. These depositions shall be conducted within 30 days after Defendants
19 complete their supplemental production of emails and patient files in accordance with this Order.

20 The State Farm Plaintiffs agree that the Motion to Compel (Dkt. No 57) is withdrawn if
21 the Court enters this Stipulated Order.

22 DATED this 6th day of Sept., 2017.

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The Honorable Robert S. Lasnik
United States District Judge

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