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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO

MELISSA A. MILLER,

Plaintiff,

vs.

CITY OF POST FALLS, a political subdivision
of the State of Idaho; R. SCOT HAUG, City of
Post Falls Chief of Police; City of Post Falls
Police Officers NEIL UHRIG, FRANK
BOWNE, BRETT CHAPMAN, AARON
OGLE, KATHY ESHOO, CHRISTINE JONES,
ROD GUNDERSON, and JOHN DOE
OFFICERS I-V,

Defendants.

)
) Case No. CV 13-00517-EJL
)

**STIPULATION RE: DEFENSE
PSYCHOLOGICAL EXAM**

The Plaintiff and Defendants, by and through their attorneys of record, hereby agree that Plaintiff Melissa Miller shall submit to a Defense Psychological Examination conducted pursuant to FRCP 25, 35 and 37, by Dr. Duane Green, Ph.D.

1. The examination shall not last longer than eight hours in one calendar day.
2. Plaintiff shall be allowed to have her legal counsel or a member of his staff present with her during only the interview portion of the examination who may observe the examination but will not unreasonably interfere or obstruct the examination.

3. The Defense Psychological Exam is for forensic evaluation only and not for purposes of treatment.

4. Defendants shall pay all of Plaintiff's expenses to attend the Defense Psychological Examination, including food expenses (one meal) and round trip travel expenses incurred by Plaintiff traveling from Post Falls, Idaho, to Spokane, Washington, and to be calculated at the rate of \$.55 per mile (50 miles roundtrip). Defendants shall be provided receipts for Plaintiff's meal expenses incurred.

5. Within twenty-one days from the examination date, Defendants shall forward to Plaintiff a report authored by the examining psychologist setting forth the opinions of the examining psychologist and a detailed statement of all facts and data said expert relied upon to generate his opinions. The report shall conform with F.R.C.P. 26 concerning expert witness reports.

6. The Plaintiff will complete an intake form and also perform requested psychological tests as well as an interview by Dr. Green.

7. Defendants agree to make Dr. Green available for deposition beyond the discovery cutoff date upon reasonable notice from Plaintiff.

8. A copy of all materials provided by the defense to Dr. Green, including correspondence, shall be provided upon request.

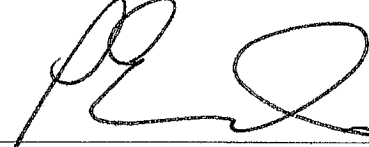
9. A copy of Dr. Green's original notes, testing material and raw data shall be provided upon request but these materials shall only be shared with Plaintiff's consulting and/or testifying expert on the issue of psychological damage and shall not be reproduced or copied. These materials shall be destroyed by Plaintiff's counsel at the conclusion of this litigation.

10. Plaintiff's counsel shall pay a reasonable copying cost of \$.10 per page.

11. Either party may designate any portion of Dr. Green's report or other documents related thereto as confidential, pursuant to the confidentiality order in this case.

DATED this 30th day of July, 2014.


PAINE HAMBLÉN LLP



PETER C. ERBLAND, ISBA #2456
Attorney for Defendants

DATED this 24th day of July, 2014.

POWELL KUZNETZ & PARKER P.S.



LARRY KUZNETZ ISBA #7620
Attorney for Plaintiff