TONY RACKAUCKAS, DISTRICT ATTORNEY
COUNTY OF ORANGE, STATE OF CALIFORNIA
POST OFFICE BOX 808
SANTA ANA, CALIFORNIA 92702
TELEPHONE: (714) 834-3600

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER
AUG 05 2013
ALAN CARLSON, Clerk of the Court
BY L. HOYLE, DEPUTY

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

THE PEOPLE OF THE STATE OF CALIFORNIA, Plaintiff, vs. MANUEL ANTHONY RAMOS JAY PATRICK CICINELLI, JOSEPH ANDREW WOLFE Defendants	Case Nos.: 11CF2575 12ZF0148 **STIPULATION OF PARTIES REGARDING DISCOVERY**

The People, counsel for defendant Jay Cicinelli, counsel for defendant Manuel Ramos, and counsel for defendant Joseph Wolfe do all hereby agree to the following:

1. That counsel for Jay Cicinelli has requested the People provide to him the following forensic samples collected in the course of the autopsy of Kelly James Thomas (DOB: 04/05/1974) by the Orange County Sheriff's-Coroner (Coroner Case No. 11-02643-MM).

   a) four "unstained recuts of each [histology] block" containing brain and/or thyroid matter.

2. That this request shall be deemed a joint request by counsel for defendant Cicinelli, counsel for defendant Ramos, and counsel for Joseph Wolfe for their joint use of the requested samples.

3. That the Orange County Sheriff's – Coroner's Department has informed the People that it possesses three (3) histology blocks which may contain brain and/or thyroid matter.

4. That if a sufficient sample exists to produce the requested material, the People will provide to counsel for defendant Cicinelli four unstained recuts of each of the three histology blocks which may contain brain and/or thyroid matter.

5. That any samples of histology blocks which are provided to counsel for defendant Cicinelli pursuant to this request shall be deemed to have been provided to counsel for all three defendants and shall be the only samples of the three histology blocks which may contain brain and/or thyroid matter that will be provided to any defendant in this matter, notwithstanding any further requests made by counsel for defendant Ramos, counsel for defendant Cicinelli, or counsel for defendant Wolfe.

SO STIPULATED:

Date: March 7, 2013

Michael D. Schwartz, Counsel for Jay Cicinelli

Date: 8/2/13

John D. Barnett, Counsel for Manuel Ramos

Date: 8/2/13

Vicki Podberesky, Counsel for Joseph Wolfe

Date: 8/2/13

Keith Bogardus, Senior Deputy District Attorney

PROOF OF SERVICE BY MAIL

STATE OF CALIFORNIA)
) ss
COUNTY OF ORANGE)

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years and not a party to the within entitled action; my business address is: 401 Civic Center Drive West, Santa Ana, CA 92701.

On Monday, August 5, 2013, I served the within the **STIPULATION OF PARTIES REGARDING DISCOVERY regarding People v. Ramos, Cicinelli and Wolfe, Court Case Numbers 11CF2575 and 12ZF0148** on interested parties in said action by placing a true copy thereof enclosed in a sealed envelope, postage thereon fully prepaid, in the United States mail at Santa Ana, CA 92701, addressed as follows:

JOHN D. BARNETT, ESQ
Law Office of Barnett & Barnett
One City Boulevard West, Suite 500
Orange, California 92868

MICHAEL D. SCHWARTZ, ESQ.
Lackie, DAmmeier, McGill & Ethir
367 North Second Avenue
Upland, CA 91786

VICKI PODBERESKY
Nasatir Hirsch et al.
2115 Main St.
Santa Monica, CA 90405

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Executed on August 5, 2013, at Santa Ana, California.

VanTuyen Tran
Information Processing Specialist