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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

_____,
Plaintiff,
v.
_____,
Defendants.

NO.

STIPULATION RE AND
AUTHORIZATION FOR
EMPLOYMENT AND WORK-
RELATED RECORDS OF

DOB: _____
SSN: ■■■■■-■■-_____

The parties hereby stipulate and agree as follows:

A. Defendant(s) may obtain copies of all employment and work-related records of

_____ from the following:

- i. _____
- ii. _____
- iii. _____
- iv. _____
- v. _____
- vi. _____

B. Copies of all records shall be obtained and distributed as follows:

- 1. Defendant(s) shall direct a Subpoena Duces Tecum to the appropriate

records custodian;

1 2. The custodian of these records shall provide one copy of the records
2 together with a form, signed by that custodian, stating the following:

3 a. The name and address of the custodian;

4 b. That as of the date signed, the records are the complete and
5 accurate records of the plaintiff named herein;

6 3. The copy received from the records custodian shall be mailed or
7 provided to a professional copying service, who shall immediately number each page serially in
8 the lower right-hand corner of each page;

9 4. Unless a party to the stipulation has stated in writing that he does not
10 want a copy of the records, the professional copying service shall make one additional copy of
11 the records and distribute the document as follows:

12 a. The documents received from the health care facility custodian
13 shall be delivered to defendant's counsel, who shall pay one-half (1/2) of the costs incurred.

14 b. The newly made copies shall be delivered to plaintiff's counsel,
15 who shall pay one-half of the costs incurred.

16 c. If plaintiff's counsel does not desire a copy of the records, as
17 indicated below, then defendant shall pay the entire cost of obtaining the documents.

18 C. Authenticity of Accuracy. The parties stipulate that the documents produced by the
19 above procedure shall be prima facie evidence of authenticity, accuracy, and completeness of
20 business records regarding the subject plaintiff at that place of employment or other work-
21 related facility. No other objections are waived.

22 D. Counsel for the parties to this stipulation shall promptly pay the costs incurred.
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E. A photocopy of the executed original of this stipulation shall be valid as the original.

DATED this _____ day of _____, 2011.

SCHROETER, GOLDMARK & BENDER

Do you want a copy?

Yes _____ No _____

By _____
JANET L. RICE, WSBA #9386
KRISTIN HOUSER, WSBA #7286
Counsel for Plaintiffs
500 Central Building
810 Third Avenue
Seattle, WA 98104
(206) 622-8000

DATED this _____ day of _____, 2011.

_____ (FIRM NAME)

Do you want a copy?

Yes _____ No _____

By _____
Counsel for Defendant _____

**AUTHORIZATION FOR THE RELEASE OF
EMPLOYMENT AND WORK-RELATED RECORDS**

I have read the foregoing stipulation regarding employment and work-related records and hereby approve the same and authorize the release as stated. Such release shall be authorized upon presentation of this Stipulation and Authorization or a photostatic copy of it.

I consent to the immediate release of the aforementioned records to the attorneys, claim representatives, agents and employees of the defendant listed above.

This authorization shall be valid for a period of ninety (90) days after the date of my signature.

