

EXHIBIT G

WILMER CUTLER PICKERING
HALE AND DORR LLP
DAVINA PUJARI, SBN 183407
davina.pujari@wilmerhale.com
CHRISTOPHER A. RHEINHEIMER, SBN 253890
chris.rheinheimer@wilmerhale.com
50 California Street, Suite 3600
San Francisco, California 94111
Telephone: (628) 235-1000
Facsimile: (628) 235-1001

WILMER CUTLER PICKERING
HALE AND DORR LLP
CHRISTOPHER CASAMASSIMA, SBN 211280
chris.casamassima@wilmerhale.com
350 South Grand Avenue, Suite 2400
Los Angeles, California 90071
Telephone: (213) 443-5300
Facsimile: (213) 443-5400

Attorneys for Defendants

TETRA TECH EC, INC., TETRA TECH, INC.,
And ANDREW BOLT

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

LINDA PARKER PENNINGTON, *et al.*,

Plaintiffs,

v.

TETRA TECH EC, INC., *et al.*,

Defendants.

Case No. 3:18-cv-05330-JD

**JOINT STIPULATION REGARDING
PLAINTIFFS' CLAIMS OF
EMOTIONAL DISTRESS**

Assigned to Hon. Judge James Donato

1 All plaintiffs selected for the Bellwether process in the above-captioned case (“Bellwether
2 Plaintiffs”), Defendants Tetra Tech EC, Inc., Tetra Tech EC, Inc., Andrew Bolt (together, the
3 “Tetra Tech Parties”), and Defendant William Dougherty (together with the Tetra Tech Parties,
4 “Defendants”), by and through their respective counsel of record, agree to this Joint Stipulation
5 regarding the appropriate scope of discovery in connection with Bellwether Plaintiffs’ allegations
6 of emotional distress.

7 WHEREAS, certain Bellwether Plaintiffs claim to have suffered emotional distress as a
8 result of Defendants’ conduct and referenced medical providers who may possess information
9 regarding those claims,

10 WHEREAS, to prepare their defense against these claims, Defendants issued subpoenas
11 for medical records to medical providers for certain Bellwether Plaintiffs,

12 WHEREAS, a dispute has arisen between the parties as to whether medical records for
13 Bellwether Plaintiffs are privileged and whether or not Bellwether Plaintiffs have waived that
14 privilege by putting their interactions with medical providers at issue,

15 WHEREAS, on July 9, 2025, counsel for Bellwether Plaintiffs and Defendants met and
16 conferred on this dispute and the pending subpoenas for medical records,

17 WHEREAS, the Parties agree that a stipulation would resolve their dispute and avoid the
18 need to litigate a motion to quash the subpoenas by clarifying Bellwether Plaintiffs’ claims and
19 thereby obviating the need for Defendants to obtain medical records as to certain Plaintiffs,

20 THEREFORE, the Parties hereby stipulate to the following undisputed facts, which are
21 deemed admissible for all purposes including at trial:

22 1. All Bellwether Plaintiffs hereby admit and agree that:

- 23 a. Plaintiffs will not rely on the testimony of a treating psychotherapist or other
24 expert to establish the emotional distress they suffered, with the exception
25 of already-disclosed Dr. Robert Peter Gale, who will not be offered to opine
26 regarding any specific Bellwether Plaintiffs’ emotional distress;

- 1 b. Plaintiffs do not allege that the conduct by Defendants caused any specific
2 disabilities or mental or medical abnormalities. The Bellwether Plaintiffs
3 allege only “garden variety” emotional distress which includes in some
4 cases anxiety;
5 c. Plaintiffs will not claim that they had any pre-existing conditions that were
6 exacerbated by Defendants’ conduct.

7 2. All Bellwether Plaintiffs, with the exception of Gulnur Tumbat and Karla Bravo,
8 hereby further admit and agree that:

- 9 a. Bellwether Plaintiffs will not testify that they sought or obtained
10 psychological treatment for the emotional distress suffered as a result of
11 Defendants’ conduct.

12 3. Defendants agree that, with the exception of the individual Bellwether Plaintiffs
13 listed in paragraph 2, they will not seek medical records pertaining to Bellwether Plaintiffs. The
14 Parties agree to cooperate in obtaining the medical records pertaining to the Bellwether Plaintiffs
15 listed in paragraph 2; specifically those Bellwether Plaintiffs will provide HIPAA releases and
16 counsel for the Defendants will request medical records that reasonably could be necessary to
17 prepare their defense.

18
19 **IT IS SO STIPULATED, through Counsel of Record.**

20
21 Dated: July 25, 2025

WILMER CUTLER PICKERING, HALE AND
DORR LLP

22
23 By: /s/ Christopher Casamassima
24 DAVINA PUJARI
25 CHRISTOPHER CASAMASSIMA
26 CHRISTOPHER A. RHEINHEIMER

27 Attorneys for Defendants TETRA TECH EC,
28 INC., TETRA TECH, INC., and ANDREW
 BOLT

1 Dated: July 25, 2025

LAW OFFICES OF RICHARD M. STEINGARD

2 By: /s/ Richard M. Steingard
3 RICHARD M. STEINGARD
4 *Attorney for Defendant WILLIAM*
5 *DOUGHERTY*

6 Dated: July 25, 2025

COTCHETT, PITRE & McCARTHY, LLP

7 By: /s/ Joseph W. Cotchett
8 JOSEPH W. COTCHETT
9 ANNE MARIE MURPHY
10 BLAIR V. KITTLE
11 *Attorneys for Plaintiffs*

12 Dated: July 25, 2025

BOWLES & VERA LLP

13 By: /s/ Bradley Bowles
14 BRADLEY BOWLES
15 *Attorneys for Plaintiffs*
16

17 Dated: July 25, 2025

GIBBS LAW GROUP

18 By: /s/ Andre Mura
19 ANDRE MURA
20 *Attorneys for Plaintiffs*
21
22
23
24
25
26
27
28