

Sample Joint Stipulations and Agreements of the Parties

The Complainant, by and through her attorney, Snider Law Offices, Michael J. Snider, Esq., and the Agency, by and through its Counsel, Attorney Idont Getalong Wityou,, hereby submits this Joint Stipulations and Agreements of the Parties in this case, and state:

Stipulations

In an attempt to facilitate the timely and efficient processing of the Complaint at issue, the Parties agree to Stipulate as follows:

The Parties Stipulate that, if called, [Witness #1] would testify to his expertise in HVAC (CV Attached hereto).

The Parties Stipulate that, if called, [Witness #1] would testify that the discharge temperature at the vents in the IMF near the Complainant's work station would be within five (5) degrees of the temperature indicated on the Cabinet Point Log as "DISC TEMP."

The Parties Stipulate that, if called, [Witness #1] would testify that the effect of closing the louvers on the discharge vents at the IMF would be to dissipate the air coming out of the vent, but not to stop the air entirely.

The Parties Stipulate that, if called, [Witness #2] would testify that she knows the Complainant and has witnessed the Complainant on her smoke breaks.

The Parties Stipulate that, if called, [Witness #2] would testify that she and Complainant smoked outside during break times around three times per night, that while [Witness #2] would stand outside, Complainant would stand just outside the door, but right near the door so that the warmer inside air would blow out onto her.

The Parties Stipulate that, if called, [Witness #2] would testify that she understood that Complainant did this in order to stay warm because the cold negatively affected her.

The Parties Stipulate that, if called, [Witness #2] would testify that the smoke breaks were 3 minutes each, at the most.

The Parties Stipulate that, if called, [Witness #2] would testify that, in her opinion, taking smoke breaks in the cold does not make Ms. Client less believable that the cold bothers her back, because (at least when [Witness #2] worked in the IMF on the floor in 1999) it was cold.

Agreements

The Parties agree that, in lieu of calling [Witness #3] or [Witness #4] as witnesses, their Deposition transcripts may be entered into the record as evidence, without objection.

The Agency has no opposition to the adding of one (1) live witness (either _____, _____, or _____) to testify as proffered in Complainant's Pre-Hearing Statement, in addition to Complainant and Dr. _____.

Respectfully Submitted,

Idont Getalong Withyou, Esq.
Agency Representative

Michael J. Snider, Esq.
Complainant's Representative