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FILED
SAN MATEO COUNTY

JUL - 7 2017

Clerk of the Superior Court
By *[Signature]*
DEPUTY CLERK

6 Attorneys for Defendant
7 STANFORD HEALTH CARE

8 SUPERIOR COURT OF CALIFORNIA
9 COUNTY OF SAN MATEO

11 ROBERT DOE,

12 Plaintiff,

13 vs.

14 STANFORD HEALTH CARE; ROBERT
15 LASTINGER; and DOES 1 THROUGH
16 25, INCLUSIVE,

16 Defendants.

CASE NO. 16CIV01627

DECLARATION OF JOHN
KRUMM IN SUPPORT OF
DEFENDANT STANFORD
HEALTH CARE'S MOTION FOR
SUMMARY ADJUDICATION

Date: September 20, 2017
Time: 9:00 a.m.
Dept: Law and Motion

17 16 - CIV - 01627
18 DEC
19 Declaration
20 594432



Gordon & Rees LLP
275 Battery Street, Suite 2000
San Francisco, CA 94111

21 I, John Krumm, submit this declaration in support of Stanford Health Care's
22 motion for summary adjudication. I have personal knowledge of the information
23 contained in this declaration.

24 1. I am currently a Surgical Technologist at Stanford Health Care. I was
25 employed in this capacity during the Spring of 2015.

26 2. Attached hereto as exhibit A is a true and correct copy of a text message
27 exchange I had with George Baez on March 31, 2015. To my knowledge, at that time,
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2017 JUL -7 P 6 121

1 Mr. Baez held the position of Interim Director of Ambulatory Perioperative Services at
2 Stanford Health Care.

3 I declare under penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct.

5 Executed this 5 day of July, 2017 at Gilroy, California.


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10 John Krumm

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Gordon & Rees LLP
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San Francisco, CA 94111

EXHIBIT A

To: George

Good day, will you be over here redwood city today or tomorrow? Have a few nurses that want to talk you about something.

Maybe Wednesday or Friday

Can give one of them your number. It would be Cece who gave your number too but it's a group that have problem an not sure who to talk to.

I will talk to them, Friday?

Ok That works I'll tell Cece. So just ask for Cece. You know who Cece is? Just checking.