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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 AND
AUTHORIZATION RE TISSUE
SLIDES, TISSUE BLOCKS AND
PATHOLOGY MATERIALS OF

The parties hereby stipulate and agree as follows:

1. Defendants may obtain all tissue slides, tissue blocks, and/or pathology materials taken from:

Plaintiff: _____
Date of birth: _____
Social Security No.: ■■■-■■-_____

from the following health care facilities or providers:

A. _____

2. Said tissue slides, tissue blocks, and/or pathology materials shall be obtained and distributed as follows:

1 A. The health care facility or provider shall provide said tissue slides, tissue
2 blocks and/or pathology materials requested together with a form, signed by the materials
3 custodian, stating the following:
4

5 i. The name and address of the custodian;

6 ii. That as of the date signed, the tissue slides, tissue blocks and/or
7 pathology materials are the complete and were taken from the decedent ____.

8 iii. Said tissue slides, tissue blocks and/or pathology materials provided
9 by the health care facility or provider shall be obtained by ____, who shall immediately deliver
10 them only to the examining physician or institution designated herein, as follows:
11

12 _____

13 B. Upon receipt of said tissue slides, tissue blocks and/or pathology materials,
14 the designated physician or institution shall immediately review said materials, shall notify
15 ____ who shall obtain said materials and return them promptly to their provider. Counsel for
16 the plaintiffs shall be provided with verification of the receipt of said materials by the examining
17 physician or institution and their return to their provider.
18

19 C. ____ shall be responsible for all of the monitoring and the transfers of said
20 tissue slides, tissue blocks and/or pathology materials.

21 D. Counsel for the defendants shall assume all responsibility for the payment of
22 all costs incurred in the examination and transfer of said tissue slides, tissue blocks and/or
23 pathology materials.

24 E. No destructive testing of said tissue slides, tissue blocks and/or pathology
25 materials shall be performed without further authorization and specific description.
26

1 3. Defendants' obligation, if any, to obtain written reports and the provision of copies
2 of any written reports generated as a consequence of this analysis shall be governed by the
3 applicable Rules of Civil Procedure, style orders covering asbestos litigation, and case law.

4 4. A photocopy of the original of this stipulation shall be as valid as the original.

5
6 DATED this ____ day of _____, 2011.

7
8 SCHROETER, GOLDMARK & BENDER

9
10 By _____
11 JANET L. RICE, WSBA #9386
12 KRISTIN HOUSER, WSBA #7286
13 Counsel for Plaintiffs
14 500 Central Building
15 810 Third Avenue
16 Seattle, WA 98104
17 (206) 622-8000

18
19 DATED this ____ day of _____, 2011.

20 _____ (FIRM NAME)

21 _____
22 Counsel for Defendant _____
23 _____
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AUTHORIZATION

1. AUTHORIZATION FOR TRANSMITTAL OF PATHOLOGY MATERIAL.
You are hereby authorized and directed to permit the transmittal of pathology materials pertaining to _____, that you have at your facility to the following pursuant to the foregoing stipulation.

2. REQUEST FOR CONFIDENTIALITY AND REVOCATION OF PREVIOUS AUTHORIZATIONS. By reason of the fact that such information that you have acquired as _____'s physician or surgeon is confidential to me, you are also requested to treat such information as confidential and requested not to furnish any of such information in any form to anyone, without written authorization from me. I hereby revoke any previously-dated medical waiver or authorization.

3. EFFECT OF A COPY. A photostatic copy of this authorization shall be considered as effective and valid as the original.

Your full cooperation with the authorized attorney is requested.

DATE _____

(Print Name)