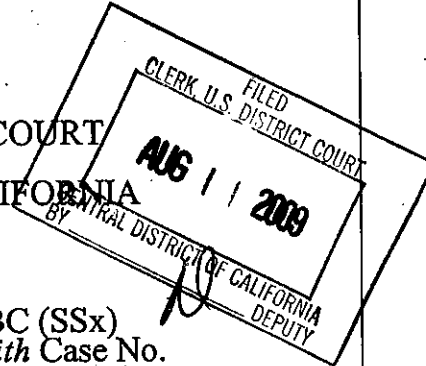


1 EDMUND G. BROWN JR.
Attorney General of California
2 RENE L. LUCARIC
Supervising Deputy Attorney General
3 MITCHELL E. RISHE
Deputy Attorney General
4 State Bar No. 193503
300 South Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-6224
6 Fax: (213) 897-7604
E-mail: Mitchell.Rishe@doj.ca.gov
7 Attorneys for Defendants
S. Mohr, G. Hing and F. Haws

All future discovery filings shall include the following language on the cover page:
"[Referred to Magistrate Judge Suzanne H. Segal]"

8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA



11
12 **LUZ FUENTES, individually and as**
13 **the Successor in Interest of JOSE**
14 **DANIEL CRUZ aka JOSE DANIEL**
15 **CRUZ FUENTES, EDGAR**
16 **JIMENEZ, JOSE GARCIA,**
17 **Deceased,**

Plaintiff,

v.

18 **COUNTY OF LOS ANGELES, et al.,**
19 **Defendants.**

CV 08-1258 ABC (SSx)
Consolidated with Case No.
CV 08-03881 ABC (SSx)

STIPULATED PROTECTIVE ORDER

Courtroom: 680
Judge: The Honorable Audrey B. Collins
Trial Date: 1/26/2010
Action Filed: 6/13/2008

20
21 **LUZ FUENTES, individually and as**
22 **the Successor in Interest of JOSE**
23 **DANIEL CRUZ aka JOSE DANIEL**
24 **CRUZ FUENTES, EDGAR**
25 **JIMENEZ, JOSE GARCIA,**
26 **Deceased,**

Plaintiff,

v.

27 **BRIAN HAWS, in his individual**
28 **capacity only, et al.,**

Defendants.

1 Pursuant to Fed. R. Civ. P. 26(c) and Local Rule 79-5.4, the parties, through
2 their attorneys of record, hereby stipulate to and request that the Court enter the
3 accompanying proposed protective order. This order is necessary to expedite
4 discovery, while maintaining confidential and private information of inmate Kurt
5 Karcher, CDC No. H-91542, and to protect parties or persons from annoyance,
6 embarrassment, oppression, or undue burden or expense.

7 The parties stipulate that they will be bound by Local Rule 79-5.4, and that
8 transcripts of depositions taken pursuant to the Federal Rule of Civil Procedure,
9 both formal and informal, designated for "Attorneys' Eyes Only": (1) will be for
10 "Attorneys' Eyes Only," and will not be disclosed or disseminated to any other
11 persons, parties or entities; (2) will be used solely in conjunction with this case, and
12 no copies shall be made except for submission to the Court or other parties; and (3)
13 at the conclusion of this matter, all copies of deposition transcripts shall be
14 destroyed or returned to the California Department of Corrections and
15 Rehabilitation.

16 The parties shall have 14 days from the taking of any deposition designated
17 "Attorneys' Eyes Only" to object to such designation. In the event a party objects
18 to the designation "Attorneys' Eyes Only," the party objecting to the designation
19 shall bear the burden of proof to establish that such documents or items are outside
20 the scope of this order, ~~and may seek the Court's in camera review of such~~
21 ~~documents or items before being allowed to remove such designation.~~ SWS

22 The parties stipulate and request that the Court find that good cause exists for
23 the issuance of the requested protective order.

24 **SO STIPULATED.**

- 25 */// The Court finds*
26 */// good cause to*
27 */// protect the*
28 */// confidential and*
private information
of inmate Kurt
Karcher.

(SWS)

IT IS SO ORDERED.

DATED: 8/11/09

[Signature]
UNITED STATES MAGISTRATE JUDGE

*May
Proceed under C.R. 37.*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: July 23, 2009

Respectfully submitted,
EDMUND G. BROWN JR.
Attorney General of California
RENE L. LUCARIC
Supervising Deputy Attorney General

/s/ Mitchell E. Rishe

MITCHELL E. RISHE
Deputy Attorney General
Attorneys for Defendants
S. Mohr, G. Hing and F. Haws

RODRIGUEZ & ASSOCIATES

M. Scott Fontes
Attorneys for Plaintiff
Luz Fuentes

LAWRENCE BEACH ALLEN &
CHOI, PC

/s/ Raymond W. Sakai

Raymond W. Sakai
Attorneys for Defendants
County of Los Angeles, Sheriff Leroy
D. Baca, Assistant Sheriff Marvin O.
Cavanaugh, Chief Mark L. Klugman,
Chief Sammy L. Jones, Robert Fish,
Ph.D., Chief Neal Tyler, Sergeant
Dan Belland, and Chief Carl Deeley

**All future discovery filings shall
include the following language
on the cover page:
"[Referred to Magistrate Judge
Suzanne H. Segal]"**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: July 23, 2009

Respectfully submitted,
EDMUND G. BROWN JR.
Attorney General of California
RENE L. LUCARIC
Supervising Deputy Attorney General

MITCHELL E. RISHE
Deputy Attorney General
Attorneys for Defendants
S. Mohr, G. Hing and F. Haws

RODRIGUEZ & ASSOCIATES


M. Scott Fontes
Attorneys for Plaintiff
Luz Fuentes

LAWRENCE BEACH ALLEN &
CHOI, PC

Raymond W. Sakai
Attorneys for Defendants
County of Los Angeles, Sheriff Leroy
D. Baca, Assistant Sheriff Marvin O.
Cavanaugh, Chief Mark L. Klugman,
Chief Sammy L. Jones, Robert Fish,
Ph.D., Chief Neal Tyler, Sergeant
Dan Belland, and Chief Carl Deeley

SD2008502637
60443229.doc

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION

I, Mitchell E. Rishe, am the ECF User whose ID and password was used to file this STIPULATION. I hereby attest that Ramond W. Sakai, counsel for the County Defendants, authorized me to sign this document electronically on his behalf.

Dated: July 23, 2009

Respectfully submitted,

EDMUND G. BROWN JR.
Attorney General of California
RENE L. LUCARIC
Supervising Deputy Attorney General

/s/ Mitchell E. Rishe

MITCHELL E. RISHE
Deputy Attorney General
Attorneys for Defendants
S. Mohr, G. Hing and F. Haws

SD2008502637
60443229.doc