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8 UNITED STATES DISTRICT COURT
 9 CENTRAL DISTRICT OF CALIFORNIA

10 PHILLIP MORRIS, JR.,
 11 Plaintiff,
 12 vs.
 13 R. A. WHITE, et al.,
 14 Defendants.
 15

CV 08-2823-VBF (SS)

[PROPOSED] PROTECTIVE ORDER

[Stipulation for Protective Order Filed Concurrently Herewith]

Courtroom: 23 – 3rd Floor
 Magistrate Judge: The Honorable
 Suzanne H. Segal

Hearing: N/A

1
2 **ORDER**

3 Based on the stipulation of the parties filed concurrently herewith, and for
4 good cause shown, the Court makes the following orders:

5 1. Plaintiff’s counsel shall maintain the confidentiality of the
6 Confidential Reports produced in discovery by Defendants for “Attorney’s Eyes
7 Only.” Specifically, Plaintiff’s counsel shall take all reasonable steps to safeguard
8 the Confidential Reports, and shall not disclose or disseminate the documents or
9 their content except as provided herein. Plaintiff’s counsel will not disseminate or
10 disclose the contents of the Reports to Plaintiff Phillip Morris, Jr. or third-parties,
11 without first obtaining the consent of Defendants’ counsel or a court order
12 authorizing such disclosure. Plaintiff’s counsel, however, may share such
13 information with experts, contractors, and investigators retained by the Plaintiff
14 without obtaining further consent provided that such individual(s) are provided
15 with a copy of this order and consent to be bound by its terms to the same extent as
16 Plaintiff’s counsel.

17 2. Plaintiff’s counsel shall not use the Confidential Reports for any other
18 reason than preparing for trial in this case.

19 3. Plaintiff’s counsel shall return the Confidential Reports, and any and
20 all copies of the Confidential Reports, to Defendants’ counsel at the conclusions of
21 the proceedings in this case, including any appeal, or as soon as a mutually
22 agreeable method for production is arranged by the Parties.

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1 4. This Protective Order, and the obligations of all persons thereunder,
2 including those related to disclosure and use of the Confidential Reports, shall
3 survive the final termination of this case, whether such termination is by
4 settlement, judgment, dismissal, appeal, or otherwise, until further order of this
5 Court.

6 IT IS SO ORDERED.

7
8 February 17, 2012

 _____/S/_____
Hon. Suzanne H. Segal
United States Magistrate Judge

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