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13 Attorneys for Defendants,  
 14 County of Los Angeles, *et al.*

15 UNITED STATES DISTRICT COURT  
 16  
 17 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

18 REBECCA A. RICKLEY,  
 19  
 20 Plaintiff,  
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 22 v.  
 23 COUNTY OF LOS ANGELES, WILLIAM  
 HOWARD, KEVIN PETROWSKY,  
 24 SOHEILA KALHOR, MICHAEL TRIPP,  
 RAJESH PATEL and DOES 2 THROUGH  
 25 20, INCLUSIVE,  
 26  
 27 Defendants.

Case No. CV08-4918-SVW(AGR<sub>x</sub>)  
 PROTECTIVE ORDER  
 REGARDING PERSONNEL  
 FILES; EXHIBIT A

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Pursuant to the Stipulation for Protective Order Relating to Personnel Files,  
IT IS HEREBY ORDERED:

All documents in the personnel files being produced by the County of Los Angeles relating to Defendants Kevin Petrowsky, Michael Tripp and Soheila Kalhor will be held confidential by Plaintiff, subject to the terms and conditions of the Stipulation executed by Counsel of Record for the Parties and attached hereto as Exhibit A.

Dated: February 6, 2009



HONORABLE ALICIA G. ROSENBERG  
UNITED STATES MAGISTRATE JUDGE

1187495.1

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14 County of Los Angeles, *et al.*

15 UNITED STATES DISTRICT COURT

16 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

17 REBECCA A. RICKLEY,

18 Plaintiff,

19 v.

20 COUNTY OF LOS ANGELES,  
21 WILLIAM HOWARD, KEVIN  
22 PETROWSKY, SOHEILA KALHOR,  
23 MICHAEL TRIPP, RAJESH PATEL and  
24 DOES 2 THROUGH 20, INCLUSIVE,

25 Defendants.  
26

Case No. CV08-4918-SVW(AGR<sub>x</sub>)

STIPULATION FOR PROTECTIVE  
ORDER RELATING TO PERSONNEL  
FILES

[Proposed] Protective Order submitted  
concurrently

Hon. Stephen V. Wilson

27 **EXHIBIT A**  
28

1 WHEREAS, Plaintiff Rebecca A. Rickley served a Notice of Taking  
2 Deposition and Demand to Produce Documents in this action on Defendants Kevin  
3 Petrowsky, Michael Tripp, and Sohelia Kalhor (“County Individual Defendants”)  
4 seeking various documents including their respective personnel records.

5 WHEREAS, the County of Los Angeles has firm policies restricting access to  
6 personnel files. Pursuant to these policies, only County management, not individual  
7 employees, may exercise custody or control over personnel files. Therefore, the  
8 County Individual Defendants initially objected to Plaintiff’s requests for production  
9 of these documents. Subsequently, the parties have met and conferred over this  
10 issue.

11 WHEREAS, in an effort to resolve this dispute, the County of Los Angeles  
12 will agree to provide copies of the personnel files for Defendants Petrowsky, Tripp  
13 and Kalhor subject to agreement by Plaintiff to the terms of this Stipulation for  
14 Protective Order. All personal information in the personnel files has been redacted  
15 and certain documents which contain solely personal information have been  
16 withheld (*i.e.*, medical records, home phone numbers, social security data, etc.)  
17 because this information is privileged and confidential and because it was  
18 specifically excluded from the document requests.

19 NOW, THEREFORE, IT IS HEREBY STIPULATED and agreed by and  
20 between Plaintiff Rebecca A. Rickley, and County Individual Defendants Kevin  
21 Petrowsky, Michael Tripp, and Sohelia Kalhor, through their counsel of record, that  
22 a Protective Order may be entered in the above-captioned action.

23 A. The following definitions apply herein:

24 1. “Personnel files” shall mean those official files maintained by  
25 the Human Resources Department of the County of Los Angeles for employees  
26 Kevin Petrowsky, Michael Tripp, and Sohelia Kalhor and which contain official  
27 information relating to their employment with the County.

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1 E. Each person to whom disclosure is made, with the exception of  
2 Counsel of Record who are presumed to know of the contents of this Stipulation and  
3 the Protective Order, shall prior to the time of disclosure be provided by the person  
4 furnishing him/her such material a copy of the Protective Order and shall agree on  
5 the record or in writing that he/she has read and will abide by this Stipulation and  
6 the Protective Order. Unless made on the record in this litigation, counsel making  
7 the disclosure to any person described above shall retain the original executed copy  
8 of said agreement until final termination of this litigation.

9 F. Provisions of this Stipulation and the Protective Order insofar as they  
10 restrict disclosure and use of the material shall be in effect until further order of this  
11 Court.

12 G. This Stipulation and the Protective Order shall not affect the right of  
13 any Party to object to the production of any documents provided pursuant to the  
14 Protective Order or to demand more stringent restrictions upon the treatment and  
15 disclosure of any documents or materials, on the ground that such documents or  
16 materials contain particularly sensitive information, or otherwise.

17 H. At the conclusion of this litigation, all copies of documents produced  
18 pursuant to this Stipulation and Protective Order will be destroyed.

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I. This instrument may be signed in counterparts and shall become effective upon signature by Counsel of Record for the Parties hereto. A signature on a faxed or emailed signature page shall have the same effect as an original signature.

IT IS SO STIPULATED.

DATED: January \_\_\_\_, 2009 LAW OFFICES OF NATASHA ROIT

\_\_\_\_\_  
NATASHA ROIT  
Attorney for Plaintiff REBECCA A. RICKLEY

DATED: January \_\_\_\_, 2009 MEYERS, NAVE, RIBACK, SILVER & WILSON

\_\_\_\_\_  
DEBORAH J. FOX  
Attorney for Defendants WILLIAM HOWARD,  
KEVIN PETROWSKY, SOHEILA KALHOR and  
MICHAEL TRIPP

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1205.008


1 I. This instrument may be signed in counterparts and shall become  
2 effective upon signature by Counsel of Record for the Parties hereto. A signature on  
3 a faxed or emailed signature page shall have the same effect as an original signature.  
4

5 IT IS SO STIPULATED.

6 DATED: January 29, 2009 LAW OFFICES OF NATASHA ROIT

7   
8 NATASHA ROIT  
9 Attorney for Plaintiff REBECCA A. RICKLEY

10 DATED: <sup>Feb</sup> January 2, 2009 MEYERS, NAVE, RIBACK, SILVER & WILSON

11   
12 DEBORAH J. FOX  
13 Attorney for Defendants WILLIAM HOWARD,  
14 KEVIN PETROWSKY, SOHEILA KALHOR and  
15 MICHAEL TRIPP

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