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DENNIS MARSHALL, COUNTY COUNSEL
JAKE STODDARD, Chief Deputy (SBN # 79203)
KELLY DUNCAN SCOTT, Deputy (SBN # 216181)
SANTA BARBARA COUNTY COUNSEL
105 E. Anapamu St., Suite 201
Santa Barbara, CA 93101
(805) 568-2950 / FAX: (805) 568-2982
jsheinbaum@co.santa-barbara.ca.us

Attorneys for Defendants
COUNTY OF SANTA BARBARA,
SANTA BARBARA SHERIFF DEPUTIES MORRIS,
ROGERS, HUDLEY HESS and SCHMIDT

NOTE CHANGES MADE BY THE COURT

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CAROL ANN GEORGE,

Plaintiff

Case No: CV 09-2258 CBM (AGRx)
~~PROPOSED~~ ORDER ON
STIPULATION FOR PROTECTIVE
ORDER FOR INFORMATION
EXHCANGED IN DISCOVERY AND
OTHER PROCEEDINGS BEFORE
THE MAGISTRATE JUDGE

Hon. Consuelo B. Marshall

v.

THE COUNTY OF SANTA
BARBARA; DEPUTY JARRETT
MORRIS, DEPUTY JEREMY
ROGERS, DEPUTY HARRY
HUDLEY, DEPUTY LARRY HESS
and DEPUTY JOSEPH SCHIMIDT
and DOES 1 through 10 inclusive,

Defendants.

NOTE CHANGES MADE BY THE COURT

COUNTY COUNSEL
County of Santa Barbara
105 East Anapamu Street
Santa Barbara, CA 93101
(805) 568-2950

1 Pursuant to the Stipulation for Protective Order for Information
2 Exchanged in Discovery and Other Proceedings Before the Magistrate Judge by
3 all parties, **IT IS HEREBY ORDERED THAT:**

4 The exchange of all documents concerning peace officer personnel
5 records as defined by Cal. Penal Code §§ 832.7 and 832.8, and records
6 described by Cal. Evidence Code §§ 1043, 1045, and 1046, during the discovery
7 process and other proceedings before the magistrate judge, and, in particular,
8 documents produced by Defendants in response to Plaintiff's Requests for
9 Production to County of Santa Barbara (Set One) numbers 3, 4, 5, 6, 7, 9, 19, 20
10 and 26 are confidential and privileged under state law and as such are subject to
11 the following:

12 1. The documents disclosed and delivered to Plaintiff's counsel of record
13 in discovery are confidential and privileged, and Plaintiff's counsel shall be
14 responsible for insuring that the terms of this order are complied with.

15 (a) Such information will be treated by Plaintiff and her representatives as
16 confidential, and will not be used for any purpose beyond that of the above-
17 referenced litigation;

18 b) Such information may be disclosed to the Plaintiff's representatives,
19 including attorneys and experts, as is necessary for purposes of the
20 above-referenced litigation;

21 (c) The designation of materials as confidential does not entitle the parties
22 to have those materials filed under seal;

23 (d) Use of any of the confidential information in motions or other
24 materials filed with the court will be pursuant to an application to the District
25 Judge ^{or Magistrate Judge, as appropriate,} to submit such confidential information under seal;

26 (e) Any application to file materials under seal must: (1) comply with
27 Local Rule 79-5; (2) seek to file under seal only those portions of the materials
28 that are confidential; (3) be supported by an appropriate showing; and (4) be

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made to the judicial officer presiding over the proceedings in question.

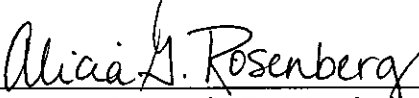
(f) Upon final conclusion of the above-referenced litigation, all designated confidential materials will be returned to defendants.

2. The documents and the information contained therein shall be kept confidential and shall be used solely in connection with the preparation and trial of the above civil case and for no other use.

3. The upon final disposition of this case Plaintiff's counsel shall promptly, without request or further order of the court, return all discovered documents and photocopies and/or reproduction of those discovered documents to the attorney of record for defendants.

IT IS SO ORDERED.

Dated: March 15, 2010



Hon. ~~Consuelo B. Marshall~~
United States ~~District~~ Court Judge
Magistrate