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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

VANESSA BROOKMAN, individually, as  
successor in interest to Anthony Brookman,  
and as personal representative of the estate  
of Anthony Brookman; SHERRY  
HERNANDEZ and DIANA SOQUI,

*Plaintiffs,*

vs.

CITY OF LOS ANGELES; LOS ANGELES  
POLICE DEPARTMENT; OFFICER  
JOEL GUITIERREZ; OFFICER  
ALAN GHASSERANI; SARGENT  
KYLE CAMPBELL; OFFICER  
JOSE SALDANA; OFFICER  
DANIEL SCHNEIDER and DOES 1  
through 100, Inclusive,

*Defendants.*

CASE NO.: CV 10-1102GHK(RCx)  
(LASC Case No: BC 428300  
Complaint filed December 31, 2009)

~~PROPOSED~~

**PROTECTIVE ORDER**

NOTE CHANGES MADE BY THE COURT.

Having reviewed the stipulated protective order submitted by the parties, this  
Court hereby orders the following:

1. The parties may designate as confidential the following:

[A] LAPD Force Investigation Division's Report;

[B] All compelled statements, whether written or recorded, of the Defendant  
Officers and other involved police officers;

all of which Defendants believe might contain information of a privileged, confidential,

1 private or sensitive nature, by affixing to such document or writing a legend, such as  
2 “Confidential.” “Confidential Documents,” “Confidential Material,” “Subject to Protective  
3 Order” or words of similar effect. This category of documents and writings so designated,  
4 and all information derived therefrom (hereinafter, collectively, “Confidential Information”),  
5 shall be treated in accordance with the terms of this stipulation.

6           2. Confidential Information may be used by the persons receiving such  
7 information only for the purpose of this litigation.

8           3. Subject to the further conditions imposed by this stipulation, Confidential  
9 Information may be disclosed only to the following persons:

10           (a) Counsel for the parties and to experts, investigators, paralegal assistants,  
11 office clerks, secretaries and other such personnel working under their supervision;

12           (b) The Court and its personnel; and

13           (c) Such other parties as may be agreed by written stipulation among the  
14 parties hereto.

15           4. Prior to the disclosure of any Confidential Information to any person  
16 described in paragraph 3(a) or 3(c), counsel for the party that has received and seeks to use  
17 or disclose such Confidential Information shall first provide any such person with a copy  
18 of this stipulation and advise that he/she is bound by the provisions of the protective order.  
19 The Court and its personnel are excluded from this requirement.

20           5. Upon the final termination of this litigation, including any appeal  
21 pertaining thereto, all Confidential Information and all copies thereof shall be returned to  
22 the Defendants, except as to Court personnel. All Confidential Information disclosed to any  
23 person or party pursuant to any provision hereof also shall be returned to the Defendants.

24           6. If any party who receives Confidential Information receives a subpoena  
25 or other request seeking Confidential Information, he, she or it shall immediately give  
26 written notice to the Defendants’ counsel, identifying the Confidential Information sought  
27 and the time in which production or other disclosure is required, and shall object to the  
28 request or subpoena on the grounds of this stipulation so as to afford the Defendants an

1 opportunity to obtain an order barring production or other disclosure, or to otherwise  
2 respond to the subpoena or other request for production or disclosure of Confidential  
3 Material. Other than objecting on the grounds of this stipulation, no party shall be obligated  
4 to seek an order barring production of Confidential Information, which obligation shall be  
5 borne by the Defendants. However, in no event should production or disclosure be made  
6 without written notice to Defendants' counsel unless required by court order after serving  
7 written notice to defendants' counsel.

8           7. Any pleadings, motions, briefs, declarations, stipulations, exhibits or  
9 other written submissions to the Court in this litigation which contain, reflect, incorporate  
10 or refer to Confidential Information shall be filed in accordance with Local Rule 79-5 and  
11 maintained under seal, after written application to the Court made ~~and~~. If the Court approves  
12 the application to file the documents under seal, the original and judge's copy of the  
13 document shall be sealed in separate envelopes with a title page affixed to the outside of  
14 each envelope. No sealed <sup>record</sup> or confidential record of the Court maintained by the Clerk shall  
15 be disclosed except upon written order of the Court.

16           8. Counsel for the parties hereto agree to request that any motions,  
17 applications or other pre-trial proceedings which could entail the discussion or disclosure  
18 of Confidential Information be heard by the Court outside the presence of the jury, unless  
19 ~~having heard from counsel,~~ the Court orders otherwise. Counsel for the parties further agree  
20 to request that, during any portion of the trial of this action which could entail the discussion  
21 or disclosure of Confidential Information, access to the courtroom be limited to parties, their  
22 counsel and other designated representative, experts or consultants who agree to be bound  
23 by this stipulation, and court personnel, unless ~~having heard from counsel,~~ the Court orders  
24 otherwise.

25           9. Nothing herein shall prejudice any party's rights to object to the

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1 introduction of any Confidential Information into evidence, on grounds including but not  
2 limited to relevance and privilege.

3 10. This Protective Order survives settlement, trial and/or appeal;

4 **IT IS SO ORDERED;** *however, The Court does not maintain jurisdiction*  
5 *as amended at* *to enforce it.*  
6 *paras. 7, 8 + 10*

7 DATED: 9/20/10

*R. Chapman*  
**HONORABLE ROSALYN M. CHAPMAN**  
**UNITED STATES MAGISTRATE JUDGE**

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