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

MAURICE MCCULLOUGH,
individually, and on behalf of other
members of the general public similarly
situated, and as an aggrieved employee
pursuant to the Private Attorneys
General Act (“PAGA”),

Plaintiff,

vs.

OFFICE DEPOT, INC., a Delaware
Corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No. CV 10-4987 GHK (JEMx)

**~~PROPOSED~~ PROTECTIVE
ORDER**

Complaint Filed: April 30, 2010
Trial Date: None Set

Based on the parties’ Stipulation to Entry of Protective Order Re: Protection
of Putative Class Member Personal Information, and good cause having been
shown, IT IS HEREBY ORDERED as follows:

1. Plaintiff’s counsel shall maintain the names and contact information of
the Signal Hill employees, as well as the information contained in the wage
statements, time records, and clock-in and clock-out records for the Signal Hill
employees, as private and confidential;
2. Plaintiff’s counsel agrees not to use the names and contact information

1 of the Signal Hill employees and/or the information contained in the wage
2 statements, time records, and clock-in and clock-out records for the Signal Hill
3 employees to solicit or cause another to solicit any of the Signal Hill employees to
4 assert any new claim, charge, or complaint of any kind whatsoever against Office
5 Depot or for any other purpose other than for the limited purpose of seeking
6 information relevant to class certification issues, Plaintiff's claims as set forth in the
7 First Amended Complaint, and/or Office Depot's defenses to Plaintiff's claims as
8 set forth in the First Amended Complaint; and

9 3. All names and contact information of the Signal Hill employees and/or
10 the information contained in the wage statements, time records, and clock-in and
11 clock-out records for the Signal Hill employees shall not be disclosed by Plaintiff
12 or his counsel to any other person except the following: (a) the legal, clerical,
13 paralegal, or other staff of Plaintiff's counsel, who will abide by the terms of this
14 Stipulation; (b) persons retained by Plaintiff's counsel to furnish expert or
15 consulting services or advice in this action, who will abide by the terms of this
16 Stipulation; and (c) the Court and the Court's staff.

17 IT IS SO ORDERED.

18
19 Date: August 9, 2011

/s/John E. McDermott

UNITED STATES MAGISTRATE
JUDGE