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[PROPOSED] PROTECTIVE ORDER RE

PRODUCTION OF DOCUMENTS

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LIEBERT CASSIDY WHITMORE A Professional Law Corporation 6033 W. Century Boulevard, Suite 500 Los Angeles, CA 90045

disclosures, supplemental disclosures, and responses to Plaintiff Rehan Nazir's written discovery requests that contain a third party's (including peace officers) private, confidential information, including but not limited to, third parties' names, phone numbers, addresses, social security numbers, arrest information, discipline, wages and similar information, some of which may be protected by California Penal Code sections 832.5 and 832.7, and California Evidence Code section, 1040 et seq., shall be kept strictly confidential and may only be examined by the attorneys for the parties, their agents, employees, consultants, witnesses, court reporters, deponents, the parties themselves, and/or the Court, and only in connection with this subject litigation, and shall not be published to any third parties or used in connection with any other litigation.

- That in the event that any party uses such documents at trial or for pretrial motion, or any other motion or filing, the parties may file protected documents as so forth in local Rule 79-5.4, so long as all protected information of third parties is redacted. Any party may seek with prior approval of the a protective order to place such documents under seal or have them stricken based court by filing an application pursuant to Local Rule 79-5.

 on failure to redact protected information.
- 3. After the conclusion of this litigation, the parties will return all documents subject to this Stipulation within 45 calendar days without awaiting any party's request.

IT IS SO ORDERED.

Dated: Nov. 29 , 2010

Honorable Alicia G. Rosenberg

Judge of the United States District Court