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6 7 8 9 10 11 12 13 14 15 16	LOS ANGELES TIMES COMMUNICATIONS LLC JEFF GLASSER (SBN 252596) 202 West First Street Los Angeles, CA 90012 Telephone: (213) 237-3760 Fax: (213) 237-3810 Attorneys for Intervenor LOS ANGELES TIMES COMMUNICATIONS LLC OLU K. ORANGE (SBN 213653) oluorange@att.net ORANGE LAW OFFICES 3435 Wilshire Blvd., Suite 2900 Los Angeles, CA 90010 Telephone: (213) 736-9900 Fax: (213) 417-8800	MICHAEL N. FEUER City Attorney (SBN 111529x) THOMAS H. PETERS Chief Assistant City Attorney CORY M. BRENTE Assistant City Attorney RENA M. SHAHANDEH Deputy City Attorney (SBN 198072) Police Litigation Section 600 City Hall East, 200 North Main St. Los Angeles, CA 90012-4119 Telephone: (213) 978-8397 Fax: (213) 978-8785 Attorneys for Defendants CITY OF LOS ANGELES, CARMEN TRUTANICH, CHARLES BECK, AND ANGEL GOMEZ
17 18	Attorneys for Plaintiffs CHRISTIAN RODRIGUEZ, ALBERTO CAZAREZ, individually and as class representatives	
19	UNITED STATES DISTRICT COURT	
20	CENTRAL DISTRICT OF CALIFORNIA	
21 22	ALBERTO CAZAREZ, individually) and as class representatives,	Case No. CV11-01135 DMG (JEMx) PROPOSED] ORDER RE:
23	Plaintiffs,	PRODUCTION OF DOCUMENTS AND MODIFICATION OF
24	VS. $\begin{cases} \mathbf{i} \\ \mathbf{j} \end{cases}$	PROTECTIVE ORDER
25 26	CITY OF LOS ANGELES, CARMEN) TRUTANICH, CHARLES BECK,) ANGEL GOMEZ, AND DOES 1) THROUGH 10,)	
27	Defendants.	
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This matter came before the Court on the "Stipulation Re Production of 1 Documents and Modification of Protective Order" (the "Stipulation") submitted by 2 Non-Party Intervenor Los Angeles Times Communications LLC ("The Times"), 3 Plaintiffs Christian Rodriguez and Alberto Cazarez, individually and as class 4 representatives ("Plaintiffs"), and Defendants the City of Los Angeles ("City"), 5 Carmen Trutanich, Charles Beck, Allan Nadir, and Angel Gomez, on the third hand 6 ("Defendants") (collectively, the "Parties"). The Stipulation is filed pursuant to an 7 Order entered by this Court on February 19, 2013, in response to The Times' Motion 8 to Modify the Protective Orders issued by this Court on November 21, 2011, and 9 December 5, 2011, to permit release of gang injunction service and arrest records that 10 have been produced in pretrial discovery (the "Records"), following the meet-and-11 confer required by that Order. 12

The Court having reviewed and considered the Stipulation and the papers
submitted in connection with The Times' previously-filed Motion to Modify the
Protective Orders, and good cause having been shown:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED as follows:

- The Protective Orders in this matter are modified to allow release of the Records subject to the redactions described in Paragraph (3), below.
- The City shall produce the Records to The Times in the form described in Paragraph (3), below, in the timeframe described in Paragraphs (4) and (5), below.
- 3) The Records shall not be edited or modified by the City in any way prior to production, except that the City may redact only the following information from the Records:
 - a. Driver's license numbers;
 - b. Social Security numbers;
 - c. Names of juveniles;

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d. Medical information;

1		e. Residential street addresses, although the city, state and zip code of
2		any residences shall not be redacted;
3		f. Names of associates of arrested or enjoined individuals; and,
4		g. Names of witnesses.
5	4)	The City will produce the Records to The Times on a rolling basis every
6		two weeks, beginning two weeks from the date of entry of this stipulation.
7	5)	The City will complete its review and production of the Records to The
8		Times within 90 days of the date of entry of this stipulation.
9	6)	Upon receipt of any record, The Times will have thirty days to challenge
10		any redactions to a document by filing an objection with this Court. The
11		City will have two weeks to respond to any objection filed by the Times.
12	7)	In the event this litigation is resolved before resolution of all issues related
13		to production of the Records, the Court will retain jurisdiction over this
14		matter until thirty (30) days after the production of the Records to The
15		Times is completed, unless any objections are pending at that time, in
16		which case the Court will retain jurisdiction until those objections are
17		resolved.
18	IT]	IS SO ORDERED.
19	DATED:	<u>July 10, 2014</u>
20		Bh & MaDomatt
21		Honorable John E. McDermott
22		United States Magistrate Judge For the Central District of California
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[PROPOSED] ORDER RE PRODUCTION OF DOCUMENTS DWT 24082962v6 0026175-000417