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10 Attorneys for Plaintiffs

11  
 12 **UNITED STATES DISTRICT COURT**  
 13 **CENTRAL DISTRICT OF CALIFORNIA**  
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|                                |                                |                           |
|--------------------------------|--------------------------------|---------------------------|
| 15 MIMIELE GOULATTE et al,     | } CASE NO. CV11-1740 DDP (JCx) |                           |
| 16 Plaintiffs,                 |                                | } PROTECTIVE ORDER        |
| 17 vs.                         |                                | } [CHANGES MADE BY COURT] |
| 18 COUNTY OF RIVERSIDE, et al, |                                | }                         |
| 19 Defendants.                 |                                |                           |
| 20                             |                                |                           |

21  
 22 Pursuant to the stipulation of the parties, and with the Court's modifications,  
 23 the following Protective Order is entered:

- 24 1. Counsel for defendant, County of Riverside, shall disclose to counsel  
 25 for plaintiffs records of individual clients placed in housing through the Mental  
 26 Health Department of the County of Riverside or the Housing Authority of the  
 27 County of Riverside.  
 28

1           2.     Counsel for the plaintiffs shall not convey, transfer, publish, distribute,  
2 copy, duplicate or disseminate the information so provided except as may be  
3 reasonably necessary for the prosecution of this litigation, by communicating  
4 with the plaintiffs, or investigators, consultants and experts retained on behalf  
5 of the plaintiffs in this matter.

6           3.     Counsel for the plaintiffs shall not disclose any such information  
7 to any such person pursuant to this order unless, prior to such dissemination, such  
8 counsel informs such person of the terms and conditions of this order and secures  
9 such person's agreement to be bound by it.

10          4.     Absent further order of the Court, plaintiffs, plaintiffs' counsel, and  
11 plaintiffs' investigators, consultants and experts, are expressly prohibited from  
12 utilizing the disclosed information for any purpose other than the prosecution of  
13 Goulatte v. County of Riverside, Case No. CV11-1740 DDP (JCx), and the  
14 information disclosed shall not be utilized in any other proceeding or litigation, or  
15 for any other purpose.

16          5.     Absent an advance agreement or Court order to the contrary,  
17 documents and information disclosed pursuant to this order will not be filed in open  
18 court and, to the extent submitted for filing, shall be submitted for filing under seal  
19 in accordance with Local Rule 79-5.1.

20          6.     Counsel for each party shall take reasonable precaution to prevent the  
21 unauthorized or inadvertent disclosure of any of the protected information.

22          7.     In the event anyone shall violate or threaten to violate any terms of this  
23 Protective Order, the aggrieved party may immediately apply to obtain  
24 injunctive relief and monetary sanctions to the Court against any such person  
25 violating or threatening to violate any of the terms of this order. The Court  
26 shall retain jurisdiction over the parties and any other persons subject to the  
27 terms of this order for the purpose of enforcing this order. The Court shall  
28 have the power to impose whatever penalties it deems appropriate for the

1 violation of said order, including, but not limited to, monetary and judicial  
2 sanctions and contempt.

3 8. This order shall survive the final termination of this action, to the  
4 extent that the information disclosed remains confidential and does not become  
5 known to the public, and the Court shall retain jurisdiction to resolve any dispute  
6 concerning the use of the information disclosed herein.

7 DATED: January 30, 2012

8 /s/  
9 \_\_\_\_\_  
10 Honorable Jacqueline Chooljian  
11 United States Magistrate Judge  
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