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7	UNITED STATES DISTRICT COURT	
8	CENTRAL DISTRICT OF CALIFORNIA	
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10	LEOCAUDIO FIGUEROA,	) No. CV 11-6228 DMG (FFM)
11	Plaintiff,	) PROTECTIVE ORDER PURSUANT TO STIPULATION
12	V.	
13	COUNTY OF LOS ANGELES, et al.,	
14	Defendants.	
15		)
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17	Pursuant to the stipulation of the parties, and good cause having been shown	
18	therefor, the Court enters the following protective order which shall govern the witness	
19	statements in the underlying criminal prosecution in CR 13-574 produced in this action	
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Any documents, including recordings or writings, sought by Plaintiffs'
 counsel pertaining to witness statements in the underlying criminal prosecution in CR
 13-0574, U.S. v. Eric Gonzales, Noel Womack, et al. are to be designated as
 "confidential material."

25 2. Confidential material shall be used solely in connection with the preparation and
26 trial of the within case, Number 11-06228 DMG (FFMx) or any related appellate
27 proceeding, and not for any other purpose, including any other litigation.

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1 3. Confidential material may not be disclosed except as provided in paragraph 4.

- 2 4. Confidential material may be disclosed only to the following persons:
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(a) Counsel for any party to this litigation.

4 (b) Paralegal, stenographic, clerical and secretarial personnel regularly employed
5 by counsel referred to in (a).

6 (c) Court personnel, including stenographic reporters engaged in such proceedings
7 as are necessarily incidental to preparation of the trial to this action.

8 (d) Any outside expert or consultant retained in connection with this action, and
9 not otherwise employed by either party.

Paragraph 4 is expressly intended to insure that confidential records that come into the
hands of individuals pursuant to the Court's ruling maintain their confidentiality and
may not be disseminated or made part of the public record, except as may be admissible
for trial.

5. Each person to whom disclosure of confidential employment or personnel records 14 is to be made, shall, prior to the time of disclosure, be provided by the person furnishing 15 him/her such material a copy of this order, and shall agree on the record, if any, or in 16 writing that s/he has read the protective order and that s/he understands its provisions. 17 Such person must also consent to be subject to the jurisdiction of the United States 18 District Court with respect to any proceeding relating to the enforcement of this order, 19 including without limitation, any proceeding for contempt. Unless made on the record in 20 this litigation, counsel making the disclosure to any person described above shall retain 21 the original executed copy of said agreement until final termination of this litigation. 22

6. If any information and/or documents which are the subject of this Protective Order
are presented to this or any other court in any other manner prior to the time of trial,
pursuant to Local Rule 79-5.1, said information and/or documents shall be lodged under
seal in an envelope clearly marked as follows: "Confidential Material Subject To A
Protective Order."

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1	7. At the conclusion of the trial and of any appeal or upon termination of this	
2	litigation, all confidential materials received under the provisions of this order (including	
3	any copies made and/or any computer materials made or stored) shall be tendered back to	
4	Plaintiff's counsel. Provisions of this order insofar as they restrict the disclosure and use	
5	of this material shall be in effect until further order of this Court.	
6	8. The foregoing is without prejudice to the right of any party:	
7	(a) To apply to the Court for a further protective order relating to confidential	
8	material or relating to discovery in this litigation;	
9	(b) To apply to the Court for an order removing the confidential material	
10	designation from any documents; and	
11	(c) To apply to the Court for an order compelling production of documents.	
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13	IT IS SO ORDERED.	
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16	DATED: June 16, 2017 /S/ FREDERICK F. MUMM	
17	FREDERICK F. MUMM	
18	United States Magistrate Judge	
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