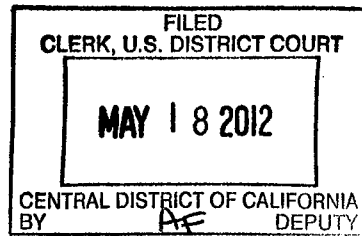


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 7 CHRISTIAN PAIZ

8 UNITED STATES DISTRICT COURT  
 9 CENTRAL DISTRICT OF CALIFORNIA  
 10 WESTERN DIVISION

11 CHRISTIAN PAIZ,  
 12 Plaintiff,  
 13 v.  
 14 DETECTIVE STEVE GARCIA,  
 CITY OF LOS ANGELES, AND  
 15 DOES 1 THROUGH 10, inclusive,  
 16 Defendants.

CASE NO. CV 11-06481-PJW  
**AMENDED STIPULATION AND  
 [PROPOSED] ORDER FOR  
 PROTECTIVE ORDER TO  
 PRESERVE CONFIDENTIALITY OF  
 MEDICAL RECORDS AND  
 INFORMATION**  
 [PROPOSED] ORDER FILED  
 CONCURRENTLY HEREWITH

18 Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, PLAINTIFF  
 19 CHRISTIAN PAIZ and DEFENDANTS CITY OF LOS ANGELES AND  
 20 DETECTIVE STEVE GARCIA, hereby stipulate that confidential medical  
 21 information disclosed by Plaintiff during discovery in this action is protected from  
 22 further disclosure and use, as follows.

23 1. Defendants intend to obtain in the future medical records of Plaintiff  
 24 and medical information about Plaintiff through discovery in this action. This  
 25 stipulation and order is intended to preserve the confidentiality of those medical  
 26 records, the information obtained in them, and any other medical information about  
 27 plaintiff disclosed by plaintiff in discovery.

28 ///

1           2. Defendants and their attorneys of record shall only use the medical  
2 records of plaintiff obtained through discovery in this case, the information  
3 contained in them, and any other medical information about plaintiff disclosed by  
4 plaintiff in discovery for purposes of the present lawsuit.

5           3. Defendants and their attorneys of record shall not show or disclose any  
6 medical records of plaintiff or any medical information about plaintiff obtained  
7 through discovery in this case to anyone other than the parties; their respective  
8 attorneys of record; legal associates, paralegals and office staff employed by the  
9 parties' attorneys; medical consultants and experts retained or consulted for  
10 purposes of this litigation; and witnesses being deposed.

11           4. Before showing or disclosing any medical records of Plaintiff or any  
12 medical information about Plaintiff obtained through discovery in this case to any  
13 person permitted by Paragraph 3 to obtain such information, counsel for Defendants  
14 shall obtain the written agreement of that person to be bound by the terms of this  
15 stipulation and order; to maintain the confidentiality of the medical records or  
16 information protected by this stipulation and order; and to refrain from disclosing  
17 Plaintiff's medical information or medical records to any third person.

18           5. If the parties in this case file with the Court any medical records  
19 protected by this stipulation and order, or file any papers containing information  
20 from those medical records or other medical information about plaintiff obtained  
21 through discovery, the medical records or other papers shall be filed and maintained  
22 under Local Rule 79-5, which governs the filing of documents under seal. Such  
23 papers shall be accompanied by an application to file the papers – or the confidential  
24 portion thereof – under seal; the application must demonstrate good cause for the  
25 under seal filing. The application shall be directed to the judge to whom the papers  
26 are directed. Pending the ruling on the application, the papers or portions thereof  
27 subject to the sealing application shall be lodged under seal.

28 ///

1           6.     This stipulation and protective order shall remain in effect permanently,  
2 and shall continue in effect even after this case is finally resolved. All medical  
3 records of Plaintiff produced by Plaintiff and maintained by the Defense will be  
4 returned to Plaintiff's counsel after termination of the litigation, including after any  
5 appeals.

6  
7 DATED: May 17, 2012

KAYE, McLANE & BEDNARSKI

8  
9 By: 

10 DAVID S. McLANE

11 Attorneys for Plaintiff Christian Paiz

12  
13 DATED: May 15, 2012

CARMEN TRUTANICH

14 City Attorney

15  
16 By: 

17 COLLEEN SMITH, Deputy City Attorney

18 Attorneys for Defendants, CITY OF LOS  
19 ANGELES and DETECTIVE STEVE  
20 GARCIA

21 **PROPOSED ORDER**

22           GOOD CAUSE APPEARING THEREFORE, based on the stipulation of the  
23 parties, IT IS HEREBY ORDERED that confidential medical information disclosed  
24 by the Plaintiff is governed by the terms of this stipulation.

25  
26 Dated: May 18, 2012

27 By: 

Honorable Patrick J. Walsh

28 United States Magistrate Judge