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UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA--WESTERN DIVISION

PAULINA D. BURTON,

Plaintiff,

v.

**ECC/OES FIRE DEPARTMENT
A/K/A "CAL-FIRE" AN AGENCY
OF THE STATE OF CALIFORNIA
AND DOES 1 Through 50, Inclusive,**

Defendants.

Case No. CV11-9328 PSG (JCGx)

**PROTECTIVE ORDER RE
INFORMATION SUBJECT TO
CIPA**

Courtroom: 880
Judge: The Honorable Philip S. Gutierrez
Trial Date: January 15, 2013
Action Filed: June 9, 2011

ORDER

Pursuant to the parties' Stipulation for Protective Order, IT IS HEREBY
ORDERED as follows:

(1) Only counsel for the parties may use the information pertaining to the
home addresses and telephone numbers of former and current employees of
defendant for the purposes of serving subpoenas for depositions or trial. The
information pertaining to the home addresses and telephone numbers of former and
current employees of defendant shall not be disclosed or used by plaintiff.

1 (2) The parties, through their counsel, may use the information produced by
2 defendant in all law and motion proceedings, however, the parties agree that any
3 information subject to this Protective Order shall be designated as "Confidential"
4 and filed under seal pursuant to L.R. 79, and shall not be disclosed to plaintiff.

5 (3) If counsel for either party wishes to disclose information protected by the
6 California Information Practices Act to persons requested to furnish litigation
7 services, other than their counsel, then said person(s) shall execute a written
8 declaration substantially in the form of Exhibit "A" hereto. The information shall
9 not be disclosed to plaintiff.

10 (4) Upon completion of this action, plaintiff's counsel shall certify to the
11 Court that they have irretrievably destroyed or returned all documents containing
12 information that have been produced pursuant to this Stipulation for Protective
13 Order and Protective Order. Plaintiff's counsel shall further certify that they have
14 destroyed or returned all copies and/or duplicates, as defined by Rule 1001(4) of the
15 Federal Rules of Evidence, that they have made of such documents.

16 (5) This Order is not intended to compromise the rights of any party to object
17 to discovery pursuant to the Federal Rules of Civil Procedure or any other
18 governing authority nor is it intended to alter any burden of proof regarding any
19 assertion of privilege in this matter.

20
21 DATED: September 06, 2012



22 UNITED STATES
23 MAGISTRATE JUDGE

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EXHIBIT "A"

I have read and I understand the Stipulation for Protective Order and Protective Order entered by the Court in the case Paulina D. Burton v. ECC/OES Fire Department a/k/a "Cal-Fire", an Agency of the State of California, CV11-9328 PSG (JCGx), and I agree to be bound by its terms.

DATED: _____

Signature

Printed Name

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