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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

KAREN ANN PAVONI,
Individually; PAMELA JOYCE
MOYET, Individually; FRED
ARTHUR SCHEID, Individually;
BOBBY LYNN COATS,
Individually,

Plaintiffs,

v.

CHRYSLER GROUP LLC and
DOES 1 through 100, inclusive,

Defendant.

Case No. CV11-10513-RGK (SPx)

STIPULATED PROTECTIVE ORDER

As stipulated and agreed by and between the respective parties hereto and their counsel, it is hereby ordered by the Court that materials and information produced by Defendant Chrysler Group LLC (hereinafter Chrysler Group) in this matter for discovery and inspection are subject to the following terms, restrictions and conditions.

1. In responding to written discovery, Chrysler Group may designate as confidential any portion of its responses or documents produced that contain trade secrets or other confidential research, development, or commercial information that it in good faith believes is confidential under Fed. R. Civ. P. 26.

1 Testimony and other information based upon documents so designated shall be
2 considered confidential and may be so designated as subject to this protective order.

3 2. In the event that Plaintiffs disagree with Chrysler Group's
4 designation of any item as confidential and subject to this protective order,
5 Plaintiffs shall send a written notice to counsel of record for Chrysler Group
6 identifying the item(s) in question. If Chrysler Group believes the item(s) in
7 question to have been appropriately designated as confidential under federal law,
8 Chrysler Group shall then, within 30 days, move for a determination by this Court
9 that the item(s) in question is to be treated as confidential under Fed. R. Civ. P. 26.
10 The procedure for resolving any such dispute shall be governed by Local Rule 37
11 (including the joint stipulation requirement). Any motion on such dispute shall be
12 set at the first available mutually convenient hearing date. Any item(s) in dispute
13 shall continue to be treated as confidential and subject to this protective order until
14 such time as the Court issues its ruling.

15 3. Any documents or information subject to this protective order
16 shall be disclosed only to (a) counsel of record in this action, (b) individuals
17 employed by or assisting counsel in preparation for, or who may testify at the trial
18 of, this action, (c) other counsel representing plaintiffs in pending cases against
19 Chrysler Group in which it was alleged that a Chrysler Group vehicle experienced
20 inadvertent rearward movement after an alleged shift to "Park" and resulted in
21 personal injury, along with individuals employed by or assisting such counsel, or
22 who may testify in such cases, and, (d) governmental authorities. Any materials
23 provided to (c) or (d) shall be subject to such other counsel and/or governmental
24 authorities agreeing in writing to be bound by this protective order, as well as
25 subject to, and within this Court's jurisdiction for purposes of this protective order.
26 Chrysler Group reserves the right to request the identities of the counsel and/or
27 governmental authorities who are provided with information subject to this
28 protective order.

1 4. Any person or firm to whom such documents or information
2 contained therein is to be disclosed shall first be advised by counsel making the
3 disclosure that, pursuant to this protective order, such person or firm may not
4 divulge any such information to any other person.

5 5. In accordance with Local Rule 79-5.1, if any papers to be lodged
6 or filed with the Court contain any material that has been designated as
7 confidential, the proposed lodging or filing shall be accompanied by an application
8 to lodge or file the papers or the portion thereof containing the designated material
9 (if such portion is segregable) under seal; and the application shall be directed to
10 the judge to whom the papers are directed. For motions, the parties shall publicly
11 file a redacted version of the motion and supporting papers.

12 6. The production of such confidential documents or information
13 by Chrysler Group shall not constitute a waiver of any privilege or other claim or
14 right of withholding or confidentiality that it may have.

15 7. The issue of whether protected materials shall be returned to
16 Chrysler Group at the end of this litigation is reserved until the end of this
17 litigation. Plaintiffs will cooperate with counsel for Chrysler Group in returning
18 documents provided to third parties pursuant to any later agreement or court order
19 to do so.

20 ENTERED this 16th day of November, 2012.

21  /s/ _____
22 U.S. Magistrate Judge Sheri Pym