Case 2:11-cv-10666-DDP-PJW Document 127-1 Filed 03/12/15 Page 1 of 3 Page ID #:2504 1 KAMALA D. HARRIS Attorney General of California JENNIE M. KELLY 2 Supervising Deputy Attorney General ERNESTO J. FONG 3 FILED Deputy Attorney General State Bar No. 192899
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E-mail: Ernesto.Fong@doj.ca.gov CLERK, U.S. DISTRICT COURT 4 5 MAR 1 2 2015 6 CENTRAL DIPIBICT OF CALIFORNIA 7 Attorneys for Custodian of Records of the California Department of Corrections and 8 Rehabilitation 9 DONALD W. COOK Attorney at Law 3435 Wilshire Blvd., Suite 2910 10 Los Angeles, CA 90010 (213) 252-9444 (213) 252-0091 facsimile 11 Attorney for Plaintiff 12 13 14 UNITED STATES DISTRICT COURT 15 CENTRAL DISTRICT OF CALIFORNIA 16 17 18 REGINALD LENARD SMITH, CV11-10666 DDP (PJWx) 19 Individually and as a class representative, STIPULATED PROTECTIVE 20 ORDER REGARDING Plaintiff, PRODUCTION OF ROBERT 21 **GRANILLO CONTACT** INFORMATION v. 22 COUNTY OF LOS ANGELES, LOS ANGELES COUNTY SHERIFF'S DEPARTMENT, CITY OF LOS ANGELES, LOS ANGELES\_\_ 23 24 POLICE DEPARTMENT, LEE BACA, DOES 1 through 10, both their 25 personal and official capacities 26 Defendants. 27 28

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Upon the stipulation filed by Plaintiff and non-party California Department of Corrections and Rehabilitation ("CDCR") and good cause appearing therefore,

IT IS HEREBY ORDERED, as follows:

This Stipulated Protective Order shall govern the use and disclosure of the last known address and telephone number (but not the birth date) of retired Parole Agent Robert Granillo ("Granillo Information").

- 1. Under no circumstances shall the Granillo Information be used in any proceeding other than the instant case, or be disseminated, in any form, except by court order.
- 2. Disclosure of Granillo Information shall be limited to the personnel and/or classification of persons listed below:
  - Counsel for party to this action;
  - (b) Staff personnel employed by counsel for any party;
  - The court and its personnel, in connection with this litigation;
- (d) Experts or consultants retained to work on this case by counsel for any part to this case; and
- (e) Investigators retained by counsel for any party to this case, as indicated above.
- 3. Plaintiff's counsel shall not provide the Granillo Information to Plaintiff, either orally or in writing.
- 4. Counsel for any party to this action shall advise those individuals to whom disclosure of the Granillo Information is to be made of the contents of this Stipulated Protective Order. Counsel shall obtain the agreement of such individual that he or she will be bound by this Stipulated Protective Order. In the event such individual does not agree to be bound by the Stipulated Protective Order, no disclosure of the Granillo Information will be made to such individual.

- Any counsel, expert, consultant or investigator retained by counsel for any party to this case shall not refer to the Granillo Information in any other court proceeding subject to further order of this court.
- If a party learns that, by inadvertence or otherwise, it has disclosed the Granillo Information to any person or in any circumstance not authorized under this Stipulated Protective Order, the party must immediately (a) notify in writing to counsel for the California Department of Corrections and Rehabilitation, (b) use its best efforts to retrieve all copies of the Granillo Information, and (c) inform the person or persons to whom unauthorized disclosures were made of all the terms of this Stipulated Protective Order.
- This Stipulated Protective Order, and the obligations of all persons thereunder, including those relating to the disclosure and use of the Granillo Information, shall survive the final termination of this case, whether such termination is by settlement, judgment, dismissal, appeal or otherwise, until further order of the court.
- 8. Nothing in this Stipulated Protective Order is intended to prevent authorized individuals from having access to the Granillo Information if they would have had access in the normal course of their duties.

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HON. PATRICK J. WALSH

U.S. MAGISTRATE JUDGE

IT IS SO ORDERED.

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