

1 That defendant County of Riverside and Riverside shall forthwith produce to
2 plaintiffs' counsel, the peace officer personnel records shown below regarding the
3 Riverside County Sheriff's Department's Internal Affairs Investigation of the June 10,
4 2011 incident complained of in this action. Riverside County Sheriff Stan Sniff may
5 designate as "protected material" under this order, the following items produced in
6 response to plaintiff's discovery demands:
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9 *Any and all witness statements, reports or other documents, obtained*
10 *or generated pursuant to the Riverside County Sheriff's Department's*
11 *Internal Affairs investigation of the June 10, 2011 incident*
12 *complained of in this action.*

13 **2. USE OF PROTECTED MATERIALS:**

14 That materials and information designated as "protected material" under this
15 Protective Order, shall not be used or disclosed by any party or their counsel, or any
16 person acting on their behalf, other than for and in the preparation, prosecution and trial
17 and of this action, and any appeal regarding this matter; save an order from a court of
18 competent jurisdiction, or otherwise being subject to disclosure for public policy reasons,
19 such as to law enforcement agencies and criminal prosecutorial agencies, any authorized
20 public disclosure of the contents of, or information describing or otherwise referencing
21 the protected materials.
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25 **3. EMPLOYEES:**

26 That the disclosure of the protected materials may be made to the Plaintiffs,
27 Plaintiffs' counsel, and any associate counsel or other counsel engaged to assist in the
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PROTECTIVE ORDER FOR DISCLOSURE OF PEACE OFFICER
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1 prosecution of this matter, employees and agents of Plaintiffs' counsel who are assisting
2 in the preparation and trial of this action, or on any appeal regarding this action, as well
3 as transcribers, certified shorthand reporters, expert witnesses and other persons needed
4 to prepare this action for trial. Any such person to whom disclosure of the protected
5 materials is made, shall be advised of, shall be subject to, and shall agree in advance of
6 disclosure to, the provisions of the Protective Order, requiring that the material and
7 information contained in the transcripts be held in confidence.
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11 **4. DISPUTES:**

12 That the material or information claimed to be "protected material" pursuant to this
13 Protective Order that is subject to a genuine good-faith dispute as to whether it is, in fact,
14 "protected material" or other information shall, until further order of the Court, be treated
15 as "protected material" in accordance with the provisions of this Protective Order. The
16 Court retains jurisdiction to modify this Protective Order and to make further orders with
17 respect to the control and use of the materials and information designated as confidential
18 pursuant to this Protective Order.
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22 **5. CONTEMPT OF COURT:**

23 That any willful violation of this Protective Order issuing may be punished as
24 contempt of court. The above and foregoing is without prejudice to the right of any party
25 to apply to a court of competent jurisdiction, either:
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1 (a) to apply to the court for a further Protective Order relating to the protected
2 material or related to discovery in this litigation; or

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4 (b) to apply to the Court for an order modifying this Protective Order, or permitting
5 the disclosure of material currently deemed to be "protected material" under this order.


6 **6. MARKING OF DOCUMENTS:**

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8 That all documents produced subject to this document shall be marked
9 "CONFIDENTIAL", and no copy of such documents shall be made which obscures or
10 eliminates such marking.
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12 **7. RETURN AND DESTRUCTION OF DOCUMENTS.**

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14 At the conclusion of the litigation (defined as dismissal with prejudice, or final
15 judgment) all documents produced subject to this Protective Order shall be returned to
16 defense counsel for destruction. Plaintiff's counsel shall provide written confirmation that
17 no copies of such documents, electronically stored or otherwise, remain in plaintiffs, that
18 of their counsel, or any person to whom plaintiffs' counsel has furnished copies of such
19 materials.
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22 Dated: 2/27, 2013



PERCY ANDERSON, UNITED STATES DISTRICT
JUDGE

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PERSONNEL RECORDS

Law Offices of Jerry L. Steering