

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

TRUSTEES OF THE SOUTHERN  
CALIFORNIA IBEW-NECA PENSION  
PLAN, et al.,

Plaintiffs,

vs.

C I E Inc., a California corporation also  
doing business as “Cayson Industrial  
Electric, Inc.”; MICHAEL ROBERT  
CAYSON, an individual doing business as  
“C I E” and “Cayson Industrial Electric,”

Defendants

Case No. CV 12-09070 JFW(AGR<sub>x</sub>)

Discovery Matters Assigned to the  
Honorable Alicia G. Rosenberg

**PROTECTIVE ORDER**

On February 26, 2013, Plaintiffs, Trustees of the Southern California IBEW-NECA Pension Plan, et al. (collectively the “Trustees”) served on the Los Angeles Unified School District (the “LAUSD”) a subpoena (the “Subpoena”) requesting production of unredacted certified payroll records (“Unredacted CPRs”) prepared by CIE, CIE Inc., Cayson Industrial Electric Inc., Cayson Industrial Electric and/or Michael Robert Cayson (collectively the “Defendants”).

The Unredacted CPRs contain the names, addresses, and social security numbers (“Identification Information”) of the Defendants’ employees. Although this Identification Information is confidential in nature, the Trustees require the information in order to calculate fringe benefit contributions allegedly owed by Defendants.

1           **IT IS HEREBY ORDERED**, pursuant to the “Stipulation for Protective Order”  
2 entered into by and among the Trustees and the LAUSD, and good cause appearing  
3 therefore:

4           1.     The LAUSD shall produce the Unredacted CPRs requested in the  
5 Subpoena within 30 days of the issuance of this Order.

6           2.     The Trustees shall not furnish, show, disclose or otherwise disseminate the  
7 Unredacted CPRs to any person except to: (a) the Trustees, their agents and employees;  
8 (b) counsel for the Trustees and office personnel assisting counsel in the preparation and  
9 trial of this action; and (c) experts and consultants who are assisting said counsel in  
10 preparation and/or trial. The Trustees shall require any person(s) identified in  
11 subparagraphs (a) through (c) to be bound to this order.

12           3.     The Unredacted CPRs may only be used for the purpose of calculating,  
13 collecting and allocating fringe benefit contributions allegedly owed by the Defendants  
14 to the Trustees for work performed by employees of the Defendants. The Unredacted  
15 CPRs may not be used for any other purpose by anyone, including those persons  
16 identified in Paragraph 2 herein.

17           4.     The Unredacted CPRs produced pursuant to the Subpoena shall be  
18 maintained in the possession and control of the Trustees and the Trustees’ counsel in  
19 such a manner that the information is not accessible to individuals not bound by this  
20 order.

21           5.     Unless a court orders otherwise, the Trustees may only file the Unredacted  
22 CPRs with a court after obtaining an “order to seal” pursuant to the applicable  
23 procedural rule.

24           6.     The Trustees may redact the Unredacted CPRs by blocking out the  
25 employees’ first and middle names (including any initials), addresses, and social  
26 security numbers contained therein. These redacted CPRs, showing the employees’ last  
27 names, may be provided to the Defendants in this action and may be filed with the Court  
28 without an order to seal.

1           7.     In the event that the Trustees are ordered by a court or any state, federal or  
2 governmental unit to produce the Unredacted CPRs, they shall provide reasonable  
3 notice to the LAUSD, through their counsel, of that court order or command, so as to  
4 allow the LAUSD to file an appropriate opposition to such order or command.

5           8.     The terms of this Order shall remain in full force and effect and shall not  
6 cease to be in effect because of the final adjudication of this litigation.

7           9.     Upon resolution of this action in trial court, the Unredacted CPRs shall be  
8 held by Trustees' counsel pending final resolution of this litigation by appeal or  
9 otherwise. Within six (6) months after such final resolution, the Unredacted CPRs shall  
10 be shredded by the Trustees' counsel. The Trustees' counsel shall give the LAUSD,  
11 through its counsel, notice when the Unredacted CPRs have been shredded.

12  
13  
14  
15 DATED: March 13, 2013

  
UNITED STATES DISTRICT COURT  
MAGISTRATE JUDGE