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FILED  
 CLERK, U.S. DISTRICT COURT  
 JAN 9 2014  
 CENTRAL DISTRICT OF CALIFORNIA  
 BY [Signature] DEPUTY

Attorneys for Defendants,  
 LOWE'S HIW, INC.

UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

GLEN SASSOON,

Plaintiff,

v.

LOWE'S HIW, INC. and DOES 1 to  
 100, Inclusive,

Defendants.

CASE NO.: 2:13-CV-03233-RGK(Ex)

(Los Angeles County Superior Court Case  
 No.: PC054009)

*stipulated Protective Order*  
~~AGREED ORDER OF PROTECTION~~

Discovery Matter

It appearing to the Court that the Plaintiff and Defendant are in agreement that  
 Lowe's HIW, Inc. (hereinafter "the Defendant") possesses proprietary policies and  
 procedures, as well as personnel files of present and former employees, that include  
 confidential information that may be subject to discovery in the proceedings in this  
 matter but which should not be made available to the public generally, this Court  
 hereby orders that:

1. All documents produced or information disclosed and any other  
 documents or records designated as "confidential" by the Defendant shall be  
 revealed only to Plaintiff, counsel of record in this case, paralegals and secretarial  
 employees under counsel's direct supervision, and such persons as are employed by  
 counsel to act as experts in this action. The information considered as "confidential"  
 and disclosed only in accord with the terms of this paragraph shall include, without  
 limitation, all of the Defendant's policies and procedures, as well as personnel

*[Handwritten Signature]*  
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1 records, including disciplinary records, identity, or any other information or  
2 documentation supplied by the Defendant in response to Plaintiff's Interrogatories or  
3 Requests for Production.

4 2. Counsel for Plaintiff shall use all documents and information produced  
5 or disclosed by the Defendant solely for the purposes of preparation for and trial of  
6 this action. This protective order in no way precludes the plaintiff from introducing  
7 documents as exhibits at trial that would otherwise be admissible. Other than for use  
8 at trial, under no other circumstances shall information or materials covered by this  
9 Protective Order be disclosed to anyone other than Plaintiff's counsel of record in  
10 this action, paralegals, secretarial employees under counsel's direct supervision, and  
11 such persons employed to act as experts in this action. At the conclusion of the  
12 proceedings in this action, all documents and information subject to this Order,  
13 including any copies or extracts or summaries thereof, or documents containing  
14 information taken therefrom, shall be returned to counsel for the Defendant.

15 3. Prior to disclosure of any documents designated as "confidential" to  
16 paralegals or secretarial employees of counsel or Plaintiff, counsel for Plaintiff shall  
17 require such employees to read this Protective Order and agree to be bound by its  
18 terms.

19 4. If counsel for Plaintiff determines that for purposes of this action,  
20 documents or information produced by the Defendant and designated as  
21 "confidential" must be revealed to a person employed to act as an expert in this  
22 action, then counsel may reveal the designated documents or information to such  
23 person, after first complying with the following:

- 24 (a) Counsel for the Plaintiff shall have the expert read this Order and shall  
25 explain the contents thereof to such expert.
- 26 (b) Counsel for the Plaintiff shall require such expert to sign a copy of this  
27 protective order that states: "I have read and understood the terms of  
28 this protective order. I further agree to be bound by its terms." Nothing

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1 in this paragraph shall be deemed to enlarge the right of Defendant to  
2 conduct discovery of any of Plaintiff's experts, except solely with  
3 respect to the ability of such expert to protect confidential information  
4 and documents from re-disclosure.

5 5. In accordance with Local Rule 79-5.1, any papers filed with the Court  
6 that contain information that has been designated as "Confidential" or "Attorneys'  
7 Eyes Only," shall be accompanied by an application to file the papers or the portion  
8 thereof containing the designated information under seal; and the application shall be  
9 directed to the judge to whom the papers are directed. For motions, the parties shall  
10 file a redacted version of the motion and supporting papers.

11 6. At the conclusion of the proceedings in this action, all documents and  
12 information subject to this Order, including any copies or extracts or summaries  
13 thereof, or documents containing information taken therefrom, shall be returned to  
14 counsel for the Defendant.

15 7. This Order is subject to revocation and modification by Order of the  
16 Court upon written stipulation of the parties, or upon motion and reasonable notice,  
17 including opportunity for hearing and presentation of evidence.

18  
19 Entered this 9<sup>th</sup> day of JANUARY, 2014.

20   
21 U.S. Magistrate Judge CHARLES F. EICK

22 APPROVED FOR ENTRY:

23   
24 Attorney for Plaintiff, Glen Sassoon

25   
26 Attorney for Defendant Lowe's HIW, Inc.  
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