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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

LOPEZ ENTERTAINMENT GROUP,
LLC, a California Limited Liability
Company,

Plaintiff,

v.

TELEMUNDO COMMUNICATIONS
GROUP, LLC, a Delaware Limited
Liability Company; TELEMUNDO
GROUP LLC, a Delaware Limited
Liability Company; TELEMUNDO
HOLDINGS, LLC, a Delaware Limited
Company; TELEMUNDO NETWORK
LLC, a Delaware Limited Liability
Company; TELEMUNDO NETWORK
GROUP LLC, a Delaware Limited
Liability Company; ARGOS
COMUNICACIONES, dba Argos
Media, a Mexican company;
CAROLCO TV; and DOES 1 through
10, inclusive,

Defendants.

CASE No. CV13-05222-FMO (MRWx)

Judge: Hon. Fernando M. Olguin
Dept.: Courtroom 22

**[PROPOSED] PROTECTIVE
ORDER**

[Fed. R. Civ. P. 26(c)]

Complaint Filed: July 19, 2013
Discovery Cut-Off: April 30, 2014
Pre-trial Conf.: October 3, 2014
Trial Date: October 21, 2014

1 Upon consideration of the Stipulation and [Proposed] Protective Order (the
2 “Stipulated Protective Order”) made and entered into by and between Plaintiff
3 LOPEZ ENTERTAINMENT GROUP, LLC (“Plaintiff”), and Defendants
4 TELEMUNDO MEDIA, LLC; TELEMUNDO GROUP, LLC, and TELEMUNDO
5 NETWORK GROUP, LLC (collectively “Defendants”), with reference to the
6 production and/or disclosure of documents or information that one or both parties
7 contend contains confidential, private, proprietary or trade secret business
8 information,

9 IT IS HEREBY ORDERED that the Stipulated Protective Order be, and
10 hereby is, entered as an Order of this Court, subject to the modification that any
11 application for under seal treatment (para. 22) will comply in full with Local Rule
12 79. Additionally, although the Court typically will **not** accept discovery motions
13 filed on an ex parte basis, the Court will consider waiving that prohibition (para. 17)
14 only upon an appropriate showing of good cause.

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17 DATED: April 3, 2014

/s/ Judge Wilner

18 _____
19 Hon. Michael R. Wilner
20 United States Magistrate Judge
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