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8					
9	Attorneys for Defendants Sikorsky Aircraft Corporation; Sikorsky Support Services, Inc. dba Sikorsky Aerospace Maintenance				
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11					
12	UNITED STATES DISTRICT COURT				
13	CENTRAL DISTRICT OF CALIFORNIA				
14					
15	COLETTE CARPENTER, etc., et al.,	Case No. 2:14-cv-07793-JAK (AJWx)			
16	Plaintiffs,	DISCOVERY MATTER			
17	VS.	STIPULATION FOR PROTECTIVE			
18	SIKORSKY AIRCRAFT	ORDER			
	CORPORATION, et al.,	Judge: Hon. John A. Kronstadt			
19	Defendants.	Magistrate: Hon. Andrew J. Wistrich			
20					
21					
22	WHEREAS, discovery in this action will likely involve production and				
23	disclosure of certain documents and information pertaining to the parties'				
24	commercially sensitive or private information, which require protection from public				
25	disclosure;				
26	WHEREAS the parties desire to litigate this action without jeopardizing their				
27	commercially sensitive or private information, or the commercially sensitive or				
28	private information of any third party;				

1	WHEREAS, the parties met and conferred regarding the terms of a proposed		
2	protective order;		
3	WHEREAS, Exhibit A is a Modified Standing Protective Order For Cases		
4	Assigned To Judge John A. Kronstadt;		
5	WHEREAS, the parties stipulate, and propose to adopt Exhibit A as the		
6	operative protective order in this matter;		
7	WHEREAS, the parties attach Exhibit B, a redline version reflecting		
8	proposed modifications to Judge Kronstadt's Standing Protective Order;		
9	IT IS THEREFORE AGREED, STIPULATED, AND REQUESTED by and		
10	among the parties, through their respective attorneys of record, that for good cause		
11	shown, Exhibit A as the operative protective order governing this matter.		
12			
13	IT IS SO ORDERED this 22 <sup>nd</sup> day of January, 2015.		
14	$\bigcap_{i} (Q_{i}) (\dot{z}_{i})$		
15	and & Writes		
16	The Honorable Andrew J. Wistrich		
17	United States Magistrate Judge		
18			
19	Respectfully Submitted,		
20			
21	Dated: January 20, 2015 James W. Hunt Mark R. Ivine		
22	FITZPATRICK & HUNT, TUCKER, COLLIER,		
23	PAGANO, AUBERT, LLP		
24	By:/s/ Mark R. Irvine		
25	Mark R. Irvine		
26	Attorneys for Defendants Sikorsky Aircraft Corporation; Sikorsky		
27	Support Services, Inc. dba Sikorsky		
28	Aerospace Maintenance		

1		
2	Dated: January 20, 2015	Ronald L.M. Goldman
3		Timothy A. Loranger
4		Baum Hedlund Aristei & Goldman, P.C.
5		
6		By: <u>/s/ Timothy A. Loranger</u>
7		Timothy A. Loranger Counsel for Plaintiffs
8	Dated: January 20, 2015	Patrick J. Kearns
9		William J. Katt
10		Wilson Elser Moskowitz Edelman
11		& Dicker LLP
12		
13		By: <u>/s/ Patrick J. Kearns</u>
14		Patrick J. Kearns Counsel for Defendant CUBIC
15		DEFENSE APPLICATIONS
16	Deted. January 20, 2015	Mask II. Schultz (admitted and has vise)
17	Dated: January 20, 2015	Mack H. Schultz (admitted pro hac vice) Perkins Coie, LLP
18		
19		By: /s/ Mack H. Schultz
		Mack H. Schultz
20		Counsel for Defendants, BAE Systems,
21		Inc.; BAE Systems Simula, Inc.; and
22		BAE Systems Aerospace & Defense Group, Inc.
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1	Dated: January 20, 2015	Steven E. Young
2		Carol Chow
3		Freeman, Freeman & Smiley, LLP
4		
5		By: <u>/s/ Steven E. Young</u> Steven E. Young
6		Counsel for Defendant Prototype
7		Engineering and Manufacturing, Inc.
8		
9		Attestation:
10		
11	Pursuant to L.R. 5-4.3.4(a)(2)(i), I attest that all signatories listed above concur in the filing's content and have authorized the filing.	
12	the ming is content and have authorit	FITZPATRICK & HUNT,
13		TUCKER, COLLIER, PAGANO, AUBERT, LLP
14		
15		By:/s/ Mark R. Irvine
16		Mark R. Irvine
17		Attorneys for Defendants Sikorsky Aircraft Corporation; Sikorsky
18		Support Services, Inc. dba Sikorsky
19		Aerospace Maintenance
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