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7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

9 **FEDERAL TRADE COMMISSION,**

Case No. CV 15-4527-GW (PLAx)

10 **Plaintiff,**

11 **v.**

PROTECTIVE ORDER

12 **BUNZAI MEDIA GROUP, INC.,**
et al.

13 **Defendants.**

14
15 Having considered Plaintiff Federal Trade Commission, Defendants Alon
16 Nottea, Roi Reuveni, Doron Nottea, Motti Nottea, Igor Latsanovski, CalEnergy,
17 Inc., Alan Argaman, Paul Medina, Secured Merchants LLC, and Relief Defendant
18 Chargeback Armor Inc.'s stipulation for a protective order pursuant to Fed. R.
19 Civ. P. 26(c), **IT IS HEREBY ORDERED:**

20 1. "Sensitive Personal Information" means any (a) Social Security
number; (b) sensitive health-related data including medical records; (c) biometric

(PROPOSED) PROTECTIVE ORDER

1 identifier; or (d) any one or more of the following when combined with an
2 individual's name, address, or phone number: (i) date of birth, (ii) driver's license
3 or other state identification number, or a foreign equivalent, (iii) military
4 identification number, (iv) passport number, (v) an individual's financial
5 institution account number, or (vi) an individual's credit or debit card number.

6 2. SENSITIVE PERSONAL INFORMATION MAY ONLY BE DISCLOSED TO:

- 7 a. the Court and court personnel;
- 8 b. the parties' outside counsel and designated employees only to
9 the extent necessary to assist in the litigation;
- 10 c. experts and contractors consulted or retained by the parties or
11 counsel, and their employees, provided that they agree in writing to abide
12 by this protective order or execute FTC Form X33-Nondisclosure
13 Agreement for Contractors;
- 14 d. any person who had prior access to the Sensitive Personal
15 Information or participated in a communication that is the subject of the
16 Sensitive Personal Information;
- 17 e. witnesses and their counsel, provided that they agree in writing
18 to abide by this protective order;
- 19 f. the individual defendants.
- 20

1 3. Disclosure of Sensitive Personal Information to any person described
2 in Paragraph 2 shall be only for the purposes of the preparation and hearing of this
3 proceeding, or any appeal, or any other matters in connection with these
4 proceedings, therefrom, and for no other purpose whatsoever.

5 8. Sensitive Personal Information shall be redacted before filing or filed
6 with a motion to seal the material.

7 9. At the conclusion of this case, any consultant or other person retained
8 to assist counsel in the preparation of this action shall destroy or return all
9 Sensitive Personal Information. All Sensitive Personal Information held by the
10 parties shall be destroyed or returned to the designee, except that the FTC shall
11 retain, return, or destroy Sensitive Personal Information in accordance with Rule
12 4.12 of the FTC's Rules of Practice.

13 10. This Order continues to govern Sensitive Personal Information after
14 conclusion of the case absent further order of the Court.

15 11. Nothing set forth herein shall change, amend, or modify the terms of
16 any prior orders of this Court, including orders concerning Sensitive Personal
17 Information.

18 **IT IS SO ORDERED.**

19 Dated: February 8, 2016



The Honorable Paul L. Abrams
United States Magistrate Judge