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MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP
ATTORNEYS AT LAW

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

KATHLEEN ANDERSON,
individually and as successor in interest
to decedent JOHNNY ANDERSON;
ESTATE OF JOHNNY ANDERSON,
by and through KATHLEEN
ANDERSON,

Plaintiff,

v.

COUNTY OF LOS ANGELES,
KARLOS MILLAN, DOES 1
THROUGH 10, INCLUSIVE,

Defendant.

Case No. 2:15-CV-09289 JFW (JCx)
*[Hon. John F. Walter; Magistrate
Judge, Jacqueline Chooljian]*

PROTECTIVE ORDER
[CHANGES MADE BY COURT]

Cmplt. Filed: 12/01/15
Trial Date: 12/20/16

Plaintiffs KATHLEEN ANDERSON, individually and as successor in interest to decedent JOHNNY ANDERSON, and the ESTATE OF JOHNNY ANDERSON ("Plaintiffs"), by and through their attorneys, and defendants, COUNTY OF LOS ANGELES and KARLOS MILLAN ("Defendants"), by and through their attorneys, submitted a Joint Stipulation for Protective Order before this Court.

The Court has read and considered all of the papers filed in support of this stipulation. Good cause appearing, this Court makes the following orders.

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1 IT IS THEREFORE ORDERED that the Joint Stipulation for Protective
2 Order Thereon is GRANTED as modified and as follows:

3 **TERMS OF THE PROTECTIVE ORDER**

4 Absent further order of the Court, plaintiffs' counsel shall have sole custody
5 and control over any documents produced by the defendants to plaintiffs pertaining
6 to the investigation into the actions of Deputy Karlos Milan during the July 5, 2015
7 incident (“Documents”).

8 Absent further order of the Court, the Documents are deemed **confidential**,
9 except to the extent set forth in this Order, and shall be used solely in connection
10 with this litigation and the preparation and trial of this case, or any related appellate
11 proceedings, and not for any other purpose, including any other litigation, and may
12 not be disclosed or disseminated to other persons, including any other counsel other
13 than as set forth herein.

14 Absent further order of the Court, plaintiffs' counsel alone will have custody,
15 control and access to the Documents and will be prohibited from releasing or
16 disseminating the Documents or the information contained within the Documents to
17 other persons including legal counsel except that the Documents may be disclosed to
18 the following persons:

- 19 (a) counsel for any party to this action;
- 20 (b) paralegal, stenographic, clerical and secretarial personnel
21 regularly employed by counsel referred to in paragraph (a);
- 22 (c) court personnel including stenographic reporters engaged in such
23 proceedings as are necessary incident to preparation for the trial in this action;
- 24 (d) any outside expert or consultant retained in connection with this
25 action, and not otherwise employed by either parties; and
- 26 (e) any “in-house” or outside experts designated by the defendants
27 to testify at trial in this matter.

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1 Any Documents so disclosed will explicitly require inclusion of a copy of this
2 Protective Order and written instructions from counsel directing compliance with
3 same.

4 Absent further order of the Court, plaintiffs' counsel may make copies of the
5 Documents, but plaintiffs' counsel will be prohibited from releasing or
6 disseminating such copies or the information contained within such copies other
7 than as set forth herein.

8 The Documents may be submitted in all law and motion proceedings if done
9 so pursuant to Local Rule 79-5 and any other pertinent orders of the assigned
10 District Judge or Magistrate Judge. See January 21, 2016 Standing Order,
11 Paragraph 9 [Docket No. 16].

12 All disputes regarding this Protective Order shall be handled pursuant to
13 Local Rule 37.

14 If, in connection with any deposition taken in this action, plaintiffs' attorneys
15 question a witness regarding materials subject to this Protective Order, or use
16 confidential material as deposition exhibits, at the request of defense counsel, the
17 transcripts of such deposition testimony and the exhibits attached to the deposition
18 transcript shall be designated as confidential material and shall be subject to the
19 provisions of this Protective Order.

20 The purpose of this Protective Order is not intended to prevent employees of
21 the County of Los Angeles from having access to the Documents if they would have
22 had access in the normal course of their job duties.

23 Defendants' decision to enter into this Stipulation and Protective Order is
24 made without waiver of the privileges and rights afforded to them, including, but not
25 limited to, the right to privacy embodied by the United States Constitution or the
26 right to object at the time of trial to the admissibility of such or to preclude
27 defendants from filing pre-trial motions with regard to the admissibility thereof or
28 the information contained therein.

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The provisions of this Order shall be in effect until further Order of the Court.
IT IS SO ORDERED.

DATED: August 9, 2016

_____/s/_____
Magistrate Judge Jacqueline Chooljian

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP
ATTORNEYS AT LAW