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NOTE: CHANGES MADE BY THE COURT

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CINDEE CORLISS, an individual;  
THE ESTATE OF SARA MARIE  
CORLISS, By and Through the  
Representative of the Estate, CINDEE  
CORLISS,

Plaintiff,

v.

COUNTY OF LOS ANGELES, a  
public entity; JIM MCDONNELL,  
individually and in his Official Capacity  
as Chief Sheriff of the Los Angeles  
County Sheriff's Department; TERRI  
MCDONALD, individually and in her  
Official Capacity as Assistant Sheriff,  
Custody Operations of the Los Angeles  
County Sheriff's Department; CRDF  
DEPUTY DOE, an individual; and  
DOES 2-100, inclusive,

Defendant.

Case No. 2:16-cv-2039 DSF (JPRx)  
*[Hon. Dale S. Fischer; Magistrate Jean  
P. Rosenbluth]*

**PROTECTIVE ORDER RE  
CONFIDENTIAL DOCUMENTS**

Action Filed: December 10, 2015

Plaintiffs CINDEE CORLISS and THE ESTATE OF SARA MARIE  
CORLISS ("Plaintiffs"), by and through their attorneys, and defendants, COUNTY  
OF LOS ANGELES, JIM MCDONNELL, and TERRI MCDONALD  
("Defendants"), by and through their attorneys, submitted a Joint Stipulation for  
Entry of Protective Order Re Confidential Documents before this Court.

The terms of the Protective Order are as follows:



1           5.       Plaintiffs' counsel alone will have custody, control and access to the  
2 documents, reports and writings, and will be prohibited from releasing or  
3 disseminating the reports or files, or the information contained within the reports or  
4 files to other persons including legal counsel other than set forth in Paragraph 9  
5 herein.

6           6.       Plaintiffs' counsel may make copies of the reports and files, but  
7 plaintiffs' counsel will be prohibited from releasing or disseminating such copies or  
8 the information contained within such copies other than as set forth herein.

9           7.       The documents identified in Paragraph 1 may be submitted in all law  
10 and motion proceedings if done so pursuant to Local Rule 79-5.

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

13          9.       The documents may be disclosed to the following persons:

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

23          10.      Any documents so disclosed will explicitly require inclusion of a copy  
24 of this Stipulation and Protective Order and written instructions from counsel  
25 directing compliance with same.

26          11.      If, in connection with any deposition taken in this action, plaintiffs'  
27 attorneys question a witness regarding materials subject to this Stipulation and  
28 Protective Order, or uses confidential material as deposition exhibits, at the request

1 of defense counsel, the relevant portions of the transcripts of such deposition  
2 testimony and the exhibits attached to the deposition transcript shall be designated  
3 as confidential material and shall be subject to the provisions of this Stipulation and  
4 Protective Order.

5       12. The purpose of this Stipulation and Order is not intended to prevent  
6 employees of the County of Los Angeles from having access to the documents if  
7 they would have had access in the normal course of their job duties.

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

14       14. Plaintiffs' counsel agrees to maintain the documents in agreement with  
15 the terms of this Stipulation and Order.

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2 15. The provisions of this Order shall be in effect until further Order of the  
3 Court or Stipulation by counsel for the parties.

4 The Court has read and considered all of the papers filed in support of this  
5 stipulation. Good cause appearing, this Court makes the following orders.  
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25 IT IS SO ORDERED.

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27 **DATED: February 14, 2017**

*Jean Rosenbluth*

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Magistrate Judge Jean P. Rosenbluth

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Magistrate Judge  
Hon. Robert J. ...

1 *Respectfully Submitted by:*

2 Minas Samuelian, Esq. (State Bar No. 242804)  
3 Robert E. Murphy, Esq. (State Bar No. 103936)  
4 Andrew M. Mallett, Esq. (State Bar No. 283345)  
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14 COUNTY OF LOS ANGELES, JIM MCDONNELL, and TERRI MCDONALD  
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Manning & Kass  
Ellrod, Ramirez, Trestler LLP