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UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

ELVIRA RAMPULA,
 Plaintiff,
 vs.
 JAMES MCGEE and JENNIFER
 MCGEE,
 Defendants

CASE NO. 2:16-cv-03819-DMG-JEM
 [PROPOSED] PROTECTIVE ORDER
 BASED UPON STIPULATION
 DISTRICT JUDGE: THE
 HONORABLE DOLLY M. GEE
 MAGISTRATE JUDGE: THE
 HONORABLE JOHN E. MCDERMOTT

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[PROPOSED] ORDER

Based upon the stipulation of the parties, and good cause appearing:

IT IS ORDERED:

1. Defendants James and Jennifer McGee shall produce all documents responsive to requests for production no. 7.
2. Plaintiff's attorneys shall not disclose such records (with the exception of records showing the hours worked by Elvira Rampula and Rico Canlas) to any third party without first giving defense counsel of record 30 days advance notice in writing of the intent to disclose such records.
3. During said 30 day notice period specified in the preceding paragraph, Defendants may seek to limit the disclosure of such items by agreement with Plaintiff's counsel or by appropriate requests made to the Court.
4. This stipulation does not require advance notice that documents subject to this stipulation will be used by any party as trial exhibits and such items may be included in exhibit notebooks without advance notice.

DATED: January 12, 2017


THE HONORABLE JOHN E.
MCDERMOTT, MAGISTRATE
JUDGE OF THE UNITED
STATES DISTRICT COURT