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<p style="text-align: center;"><b>FILED</b> CLERK, U.S. DISTRICT COURT</p> <p style="text-align: center; font-size: 1.2em;">4/10/2017</p> <p style="text-align: center; font-size: 0.8em;">CENTRAL DISTRICT OF CALIFORNIA BY: <b>GR</b> DEPUTY</p>
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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ANNI MA,

Plaintiff,

vs.

CITY OF LOS ANGELES; CITY OF LOS ANGELES POLICE DEPARTMENT; OFFICER WESTON #38719, Individually and in his Official Capacity as Police Officer; OFFICER BERMUDEZ #38268, Individually and in his Official Capacity as a Police Officer; and DOES 1 through 10, Inclusive,

Defendant.

**CASE NO. CV16-05819 DMG(RAO)**  
[Assigned to Hon. Dolly M. Gee  
Magistrate: Rozella A. Oliver]

**PROTECTIVE ORDER**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Whereas Plaintiff ANNI MA has propounded requests for production of documents and has requested confidential documents from Defendants CITY OF LOS ANGELES and LOS ANGELES POLICE DEPARTMENT, and the parties

1 having met and conferred, and seek to avoid burdening the Court with possibly  
2 unnecessary discovery motions, and whereas the parties agree the release of certain  
3 documents may assist in resolving this matter, and have stipulated to the following  
4 terms and conditions, IT IS HEREBY ORDERED:  
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6 1. The parties may designate as confidential the following:  
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8 [A] The Use of Force Report pertaining to the Los Angeles Police  
9 Department's internal investigation of the incident underlying this lawsuit; and

10 [B] Any documents which the Court orders or the parties agree in  
11 writing shall be kept confidential;  
12

13 all of which the parties believe might contain information of a privileged,  
14 confidential, private or sensitive nature, by affixing to such document or writing a  
15 legend, such as "Confidential," "Confidential Documents," "Confidential  
16 Material," "Subject to Protective Order" or words of similar effect. These  
17 categories of documents and writings so designated, and all information derived  
18 therefrom (hereinafter, collectively, "Confidential Information"), shall be treated in  
19 accordance with the terms of this stipulation.  
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22 2. Confidential Information may be used by the persons receiving  
23 such information only for the purpose of this litigation.  
24

25 3. Subject to the further conditions imposed by this stipulation,  
26 Confidential Information may be disclosed only to counsel for the parties and to  
27 experts.  
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1           4.     Prior to the disclosure of any Confidential Information to any  
2 expert, counsel for the party that has received and seeks to use or disclose such  
3 Confidential Information shall first provide any such person with a copy of this  
4 Order, and shall cause him or her to execute, on a second copy which counsel shall  
5 thereafter serve on the other party the following acknowledgment:  
6

7                     “I understand that I am being given access to Confidential  
8 Information pursuant to the foregoing stipulation and order.  
9

10                    I have read the Order and agree to be bound by its terms  
11 with respect to the handling, use and disclosure of such  
12 Confidential Information.  
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14                    Dated: \_\_\_\_\_/s/ \_\_\_\_\_”  
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16           5.     Upon the final termination of this litigation, including any appeal  
17 pertaining thereto, all Confidential Information and all copies thereof shall be  
18 returned to the Defendants, except as to Court personnel. All Confidential  
19 Information disclosed to any person or party pursuant to any provision hereof also  
20 shall be returned to the Defendants.  
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22           6.     If any party who receives Confidential Information receives a  
23 subpoena or other request seeking Confidential Information, he, she or it shall  
24 immediately give written notice to the Defendants’ counsel, identifying the  
25 Confidential Information sought and the time in which production or other  
26 disclosure is required, and shall object to the request or subpoena on the grounds of  
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1 this stipulation so as to afford the Defendants an opportunity to obtain an order  
2 barring production or other disclosure, or to otherwise respond to the subpoena or  
3 other request for production or disclosure of Confidential Material. Other than  
4 objecting on the grounds of this stipulation, no party shall be obligated to seek an  
5 order barring production of Confidential Information, which obligation shall be  
6 borne by the Defendants. However, in no event should production or disclosure be  
7 made without written notice to Defendants' counsel unless required by court order  
8 after serving written notice to defendants' counsel.  
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11           7. Any pleadings, motions, briefs, declarations, stipulations,  
12 exhibits or other written submissions to the Court in this litigation which contain,  
13 reflect, incorporate or refer to Confidential Information shall be filed and maintained  
14 under seal, after written application to the Court made. If the Court approves the  
15 application to file the documents under seal, the original and judge's copy of the  
16 document shall be sealed in separate envelopes with a title page affixed to the  
17 outside of each envelope. No sealed or confidential record of the Court maintained  
18 by the Clerk shall be disclosed except upon written order of the Court.  
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21           8. Counsel for the parties shall request that any motions,  
22 applications or other pre-trial proceedings which could entail the discussion or  
23 disclosure of Confidential Information be heard by the Court outside the presence of  
24 the jury, unless having heard from counsel, the Court orders otherwise.  
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27           9. Nothing herein shall prejudice any party's rights to object to the  
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1 introduction of any Confidential Information into evidence, on grounds including  
2 but not limited to relevance and privilege.

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4 10. This Protective Order survives settlement, trial and/or appeal.

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6 DATED: April 10, 2017

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9 HONORABLE ROZELLA A. OLIVER  
10 UNITED STATES MAGISTRATE JUDGE  
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