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NOTE: CHANGES MADE BY THE COURT

11 Attorneys for Defendant,  
12 TARGET CORPORATION

13 **UNITED STATES DISTRICT COURT**  
 14 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

15 SUSAN C. CAMPBELL,

16 Plaintiff,

17 v.

18 TARGET CORPORATION, and DOES  
19 1 to 20 Inclusive,,

20 Defendant.

Case No. 2:18-cv-01951-FMO(JPRx)

**RE: STIPULATION FOR  
PROTECTIVE ORDER**

21 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

22 The Court has read and considered the parties' "Stipulation For Protective  
23 Order". Good cause appearing, this Court makes the following orders:

24 1. This Order is meant to encompass all forms of disclosure which may  
 25 contain confidential material, including all documents, pleadings, motions, exhibits,  
 26 declarations, affidavits, deposition transcripts, inspection reports, and all other  
 27 tangible items (electronic media, photographs, videocassettes, etc.) For purposes of  
 28 this Stipulated Protective Order confidential material is defined as Target  
 Corporation's nonpublic policies and procedures documents.

2. Good cause exists for this stipulated protective order because Target's  
 policies and procedures documents contain proprietary information of Target and  
 Target only authorizes production of these proprietary documents subject to a

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1 protective order. Target believes it would suffer harm if its proprietary policies and  
2 procedures documents were disseminated.

3 3. The parties may designate any confidential material produced or filed  
4 in this Lawsuit as confidential and subject to the terms of this Order by identifying  
5 such materials as confidential. Any material identified as confidential shall not be  
6 disclosed to any person or entity except to the parties, counsel for the respective  
7 parties, and expert witnesses assisting counsel in this Lawsuit, and the Court.

8 4. Any material designated as confidential pursuant to paragraph 1 above  
9 shall be used solely for the purposes of this Lawsuit and for no other purpose.

10 5. If additional persons become parties to this Lawsuit, they shall not have  
11 access to any confidential material until they execute and file with the Court their  
12 written agreement to be bound by the terms of this Order.

13 6. In the event that any question is asked at a deposition that calls for the  
14 disclosure of confidential material, the witness shall answer such question (unless  
15 otherwise instructed not to do so on grounds of privilege) provided that the only  
16 persons in attendance at the deposition are persons who are qualified to receive such  
17 information pursuant to this Order. Deposition testimony may be designated as  
18 confidential following the testimony having been given provided that: (1) such  
19 testimony is identified and designated on the record at the deposition, or (2) non-  
20 designating counsel is notified of the designation in writing within thirty days after  
21 receipt by the designating party of the respective deposition transcript. All  
22 deposition transcripts in their entirety shall be treated in the interim as confidential  
23 pursuant to paragraph 1 above. When confidential material is incorporated in a  
24 deposition transcript, the party designating such information confidential shall make  
25 arrangements with the court reporter not to disclose any information except in  
26 accordance with the terms of this Order.

27 7. If a party believes that any confidential material does not contain  
28 confidential information, it may contest the applicability of this Order to such

1 information by notifying the designating party's counsel in writing and identifying  
2 the information contested. The parties shall have thirty days after such notice to  
3 meet and confer and attempt to resolve the issue. If the dispute is not resolved  
4 within such period, the party seeking the protection shall have thirty days in which  
5 to make a motion for a protective order under Local Rule 37 with respect to  
6 contested information. Information that is subject to a dispute as to whether it is  
7 properly designated shall be treated as designated in accordance with the provisions  
8 of this Order until the Court issues a ruling.

9       8. Inadvertent failure to designate any material confidential shall not  
10 constitute a waiver of an otherwise valid claim of confidentiality pursuant to this  
11 Order, so long as a claim of confidentiality is asserted within fifteen days after  
12 discovery of the inadvertent failure. At such time, arrangements shall be made by  
13 the parties to designate the material confidential in accordance with this Order.

14       9. This Order shall be without prejudice to the right of any party to oppose  
15 production of any information or object to its admissibility into evidence.

16       10. When any counsel of record in this Lawsuit or any attorney who has  
17 executed a Confidentiality Agreement becomes aware of any violation of this Order,  
18 or of facts constituting good cause to believe that a violation of this Order may have  
19 occurred, such attorney shall report that there may have been a violation of this  
20 Order to the Court and all counsel of record.

21       11. Within thirty days after the termination of this Lawsuit (whether by  
22 dismissal of final judgment), all confidential material (including all copies) shall be  
23 returned to counsel for the designating party. In addition, counsel returning such  
24 material shall execute an affidavit verifying that all confidential material produced  
25 to such counsel and any subsequently made copies are being returned in their  
26 entirety pursuant to the terms of this Order. Such a representation fully  
27 contemplates that returning counsel has: (1) contacted all persons to whom that  
28 counsel disseminated confidential material, and (2) confirmed that all such material

1 has been returned to disseminating counsel. This paragraph does not cover  
2 documents filed under seal with the court.

3 12. After the termination of this Lawsuit, the provisions of this Order shall  
4 continue to be binding and this Court shall retain jurisdiction over the parties and  
5 any other person who has access to documents and information produced pursuant  
6 to this Order for the sole purpose of enforcement of its provisions.

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9 DATED: October 3, 2018

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13 Hon. Jean P. Rosenbluth  
14 U.S. Magistrate Judge  
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