1 2 3 4 5 UNITED STATES DISTRICT COURT 6 WESTERN DIVISION, CENTRAL DISTRICT OF CALIFORNIA 7 8 KIANI LEWIS, on behalf of herself Case No. 2:18-cv-02871-VAP-(PJWx) and all others similarly situated and 9 ASSIGNED FOR ALL PURPOSES TO aggrieved, DISTRICT JUDGE VIRGINIA A. 10 PHILLIPS AND MAGISTRATE Plaintiff, JUDGE PATRICK J. WALSH 11 v. AMENDED STIPULATED 12 PROTECTIVE ORDER EXPEDITORS, INC., EXPEDITORS REGARDING NOTICE TO 13 INTERNATIONAL, EXPEDITORS PUTATIVE CLASS INTERNATIONAL OF 14 WASHINGTON, INC., 15 Defendants. 16 17 Defendants EXPEDITORS. INC.. EXPEDITORS INTERNATIONAL. 18 EXPEDITORS INTERNATIONAL OF WASHINGTON, INC., ("Defendants") and 19 Plaintiff KIANI LEWIS ("Plaintiff") (collectively referred to as the "Parties"), by and 20 through their respective counsel of record (and on behalf of all counsel for record), 21 hereby submit this Stipulated Protective Order: 22 WHERAS, Plaintiff filed a class-action complaint ("Complaint") in the 23 Superior Court of California, County of Los Angeles on or around February 26, 2018. 24 Defendant filed a Notice of Removal of Civil Action on April 6, 2018, in the United 25

States District Court, Central District of California. Plaintiff filed a First Amended

Complaint ("FAC") on May 4, 2018, and Defendants answered on May 18, 2018.

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AMENDED PROTECTIVE ORDER

Case No. 2:18-cv-02871-VAP-(PJWx)

WHEREAS, the Parties agree that to ensure that third-parties' private contact information is adequately protected, the Parties choose to follow the notice process sanctioned by Central District of California in *York v. Starbucks Corp.*, 2009 U.S. Dist. LEXIS 92274, *4-5, 2009 WL 3177605 (C.D. Cal. June 30, 2009), and stipulate as follows:

- 1. The protections of this Stipulation and Order are in addition to the general protections the Parties agreed to under the Parties' Stipulated Protective Order, entered by this Court on or around October 17, 2018 ("Protective Order") [Dkt No. 33].
- 2. Contact information for the putative class is protected by the employees' right to privacy, and it shall be designated as "CONFIDENTIAL" as defined by Paragraphs 4a. of the Parties' Protective Order before being produced to Plaintiff's Counsel.
- 3. At the outset of Plaintiff's Counsel's (or their designees') first contact with each current or former employee, Plaintiff's Counsel (or their designee) will inform each contacted individual that (a) the individual has the right not to talk with Plaintiff's Counsel (or their designee) and (b) that, if he or she elects not to talk to Counsel (or their designee), Counsel (or their designee) will terminate the contact and not contact them again.
- 4. Plaintiff's Counsel (or their designee) will also inform each individual that his or her refusal to speak with counsel will not prejudice his or her rights as a putative class member should the Court certify the class.
- 5. Plaintiff's Counsel (or their designee) will keep a list of all individuals contacted and all individuals who make it known that they do not want to be contacted and preserve that list for the Court.
- 6. The contact information will be used only for the purposes of this action, and it will not be disseminated to anyone who is not necessary to the prosecution of this case.

1	7. A Party who seeks to file under seal any contact information for the	
2	putative class will comply with Local Rule 79-5. Said contact information may only	
3	be filed under seal pursuant to a court order authorizing the sealing of the specific	
4	contact information at issue. If a Pa	arty's request to file said contact information is
5	denied by the Court, then the Party may file the contact information in the public	
6	record unless otherwise instructed by the Court.	
7	IT IS SO STIPULATED.	
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9	Dated: December 4, 2018	LITTLER MENDELSON, P.C.
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11		HELENE WASSERMAN
12		MIRANDA A. MOSSAVAR ALLAN G. KING
13		TARA L. PRESNELL BRITNEY N. TORRES
14		Attorneys for Defendants, EXPEDITORS, INC., EXPEDITORS INTERNATIONAL,
15		EXPEDITORS INTERNATIONAL OF WASHINGTON, INC.
16		Wildlin (G1G1,) II (G)
17	Dated: December 4, 2018	SHEGERIAN & ASSOCIATES, INC.
18		
19		CARNEY R. SHEGERIAN
20		ANTHONY NGUYEN CHERYL A. KENNER
21		Attorneys for Plaintiff, KIANI LEWIS, and all other similarly situated
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1	<u>ORDER</u>	
2	Upon review of the Parties' Stipulated Protective Order Regarding Notice to the	
3	Putative Class and upon a finding of good cause, it is hereby ordered that the foregoing	
4	Stipulated Protective Order Regarding Notice to the Putative Class is approved and the	
5	Parties are ordered to act in compliance therewith.	
6	IT IS SO ORDERED.	
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8	Dated: December 7, 2018 Fatrick J. Walsh	
9	HON. PATRICK J. WASLH	
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