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UNITED STATES DISTRICT COURT
WESTERN DIVISION, CENTRAL DISTRICT OF CALIFORNIA

KIANI LEWIS, on behalf of herself
and all others similarly situated and
aggrieved,,

Plaintiff,

v.

EXPEDITORS, INC., EXPEDITORS
INTERNATIONAL, EXPEDITORS
INTERNATIONAL OF
WASHINGTON, INC.,

Defendants.

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

ASSIGNED FOR ALL PURPOSES TO
DISTRICT JUDGE VIRGINIA A.
PHILLIPS AND MAGISTRATE
JUDGE PATRICK J. WALSH

**AMENDED STIPULATED
PROTECTIVE ORDER
REGARDING NOTICE TO
PUTATIVE CLASS**

Defendants EXPEDITORS, INC., EXPEDITORS INTERNATIONAL,
EXPEDITORS INTERNATIONAL OF WASHINGTON, INC., (“Defendants”) and
Plaintiff KIANI LEWIS (“Plaintiff”) (collectively referred to as the “Parties”), by and
through their respective counsel of record (and on behalf of all counsel for record),
hereby submit this Stipulated Protective Order:

WHEREAS, Plaintiff filed a class-action complaint (“Complaint”) in the
Superior Court of California, County of Los Angeles on or around February 26, 2018.
Defendant filed a Notice of Removal of Civil Action on April 6, 2018, in the United
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.

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

6 1. The protections of this Stipulation and Order are in addition to the general
7 protections the Parties agreed to under the Parties' Stipulated Protective Order,
8 entered by this Court on or around October 17, 2018 ("Protective Order") [Dkt No.
9 33].

10 2. Contact information for the putative class is protected by the employees'
11 right to privacy, and it shall be designated as "CONFIDENTIAL" as defined by
12 Paragraphs 4a. of the Parties' Protective Order before being produced to Plaintiff's
13 Counsel.

14 3. At the outset of Plaintiff's Counsel's (or their designees') first contact
15 with each current or former employee, Plaintiff's Counsel (or their designee) will
16 inform each contacted individual that (a) the individual has the right not to talk with
17 Plaintiff's Counsel (or their designee) and (b) that, if he or she elects not to talk to
18 Counsel (or their designee), Counsel (or their designee) will terminate the contact and
19 not contact them again.

20 4. Plaintiff's Counsel (or their designee) will also inform each individual
21 that his or her refusal to speak with counsel will not prejudice his or her rights as a
22 putative class member should the Court certify the class.

23 5. Plaintiff's Counsel (or their designee) will keep a list of all individuals
24 contacted and all individuals who make it known that they do not want to be contacted
25 and preserve that list for the Court.

26 6. The contact information will be used only for the purposes of this action,
27 and it will not be disseminated to anyone who is not necessary to the prosecution of
28 this case.

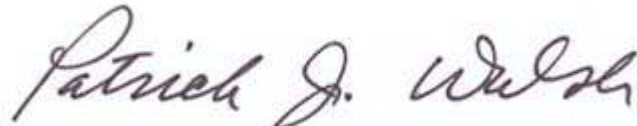
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ORDER

Upon review of the Parties' Stipulated Protective Order Regarding Notice to the Putative Class and upon a finding of good cause, it is hereby ordered that the foregoing Stipulated Protective Order Regarding Notice to the Putative Class is approved and the Parties are ordered to act in compliance therewith.

IT IS SO ORDERED.

Dated: December 7, 2018



HON. PATRICK J. WASLH