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6	BURKE, WILLIAMS & SORENSEN, L	LP NOTE CHANGES MADE BY THE COURT	
7	BURKE, WILLIAMS & SORENSEN, LLP Daniel W. Maguire (SBN 120002) E-mail: dmaguire@bwslaw.com Edith Sanchez Shea (SBN 177578)		
8	Edith Sanchez Shea (SBN 177578) E-mail: eshea@bwslaw.com		
9 10	E-mail: eshea@bwslaw.com 444 South Flower Street, Suite 2400 Los Angeles, CA 90071-2953 Tel: (213) 236-0600 Fax: (213)236-2	700	
11	Attorneys for Defendant Vulcan Materials Company Long Term		
12	Disability Plan		
13			
14	UNITED STATES DISTRICT COURT		
15	CENTRAL DISTRICT OF CALIFORNIA, EASTERN DIVISION		
16			
17	JANICE PARKER,	Case No. EDCV 07-1512 SGL (OPx)	
18	Plaintiff,	STIPULATED CONFIDENTIALITY	
19	v .	AGREEMENT AND [PROPOSED] PROTECTIVE ORDER	
20	VULCAN MATERIALS COMPANY LONG TERM DISABILITY PLAN, an		
21	ERISA plan; VULCAN MATERIALS COMPANY, a corporation; DOES 1-		
22	10,	NOTE CHANGES MADE BY THE COURT	
23	Defendants.		
24			
25	IT IS HEREBY ORDERED that certain documents, materials or information		
26	to be produced by Defendant in discovery (as described in Paragraph 1) shall be		
27	subject to the following Order with respect to confidentiality and privacy.		
28	///		
BURKE, WILLIAMS & SORENSEN, LLP ATTORNEYS AT LAW LOW ANGELES	(,A #4824-5357-9779 v1 -	CASE NO. EDCV 07-1512 SGL (OPX) 1 - STIP. CONF. AGREEMENT & [PROPOSED] PROTECTIVE ORDER	

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BURKB, WILLIAMS & SORENSEN, LLP ATTORNEYS AT LAW LOS ANGELES

LA #4824-5357-9779 v!

1. The information/items governed by this Order are all materials produced in discovery in this matter designated as subject to this protective order. The information made subject to protective order contains the internal business communications, policies, and proprietary procedures of the claim administrator, Hartford Life and Accident Insurance Company ("Hartford"), and/or private information, including financial information, pertaining to third parties. The claims manual to be subject to this protective order represents a compilation of the experience that Hartford has acquired over the years at great time, expense and effort. It contains confidential information that would be valuable to competitors. The general dissemination of these materials and disclosures of Hartford's internal business communications, policies, and proprietary procedures to competitors and to the general public would work to Hartford's commercial and competitive disadvantage.

2. The documents, materials or information identified in Paragraph 1 of this Order contain or constitute confidential, private, proprietary and/or trade secret information, and shall be subject to the terms of this Order. Said documents, materials or information, including all information contained therein, and all copies, descriptions, summaries, notes, abstracts or portions of pleadings or transcripts which contain or are derived from such information, hereinafter shall be referred to as "the Information."

3. The Information shall be used solely for the purpose of this action. No part of the Information shall be disclosed to any person or otherwise made public except pursuant to this Order.

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- 2 - STIP.
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CASE NO. EDCV 07-1512 SGL (OPX) STIP. CONF. AGREEMENT & [PROPOSED] PROTECTIVE ORDER BURKE, WILLIAMS & SORENSEN, LLP ATTENNETS AT LAW LAW ANGELES

4. The Information may be disclosed only to the persons described in the
following sentence, only to the extent that such person is performing work in
connection with this action, and only to the extent necessary to perform that work.
Such persons are: (a) Plaintiff Janice Parker; (b) Defendant Vulcan Materials
Company Long Term Disability Plan; (c) Claim Administrator Hartford
(individually a "Party" or collectively "the Parties" to this action); (d) counsel of
record for the Parties; (e) any person regularly employed by such counsel, including
legal assistants, secretaries, law clerks, investigators, associates and contract
attorneys; (f) actual or prospective experts and consultants retained or consulted by
a Party or a Party's counsel in the course of this action; (g) any potential deposition
and trial witnesses, to the extent counsel deems it necessary for and relevant to the
testimony of such witnesses; and (h) this Court and its staff. These persons shall
not disclose, discuss or reveal the Information, its contents or existence, or the
documents containing the Information to any other person or entity not specifically
identified in this Paragraph. Upon demand, Plaintiff's counsel and these persons
will return the Information and all copies of documents relating thereto to
Defendant's attorneys at the conclusion of this action

- 5. No copies, summaries, digests, notes or descriptions of the Information shall be provided by a Party or its counsel for distribution to persons other than those described in Paragraph 5.
- 6. Persons to whom access to the Information is given pursuant to this Order shall keep such material and any copies, extracts, summaries, notes or descriptions thereof secure in accordance with the purposes and intent of this Order and shall adopt and employ all suitable precautions to ensure continued confidentiality, non-use and non-disclosure. No disclosure shall be made to any person pursuant to Paragraph 5(c), 4(d) or 4(e) until such person has executed their

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CASE NO. EDCV 07-1512 SGL (OPX)
- 3 - STIP. CONF. AGREEMENT & [PROPOSED]
PROTECTIVE ORDER

written Understanding and Agreement to be bound by this Order in the form attached hereto as Exhibit 1. Upon request of any Party, the original transcript and any and all 4 7. copies of any deposition containing (a) documents pertaining to the Information as exhibits, or (b) testimony relating to the Information, shall be marked on its cover "CONTAINS CONFIDENTIAL INFORMATION. DO NOT DISCLOSE EXCEPT BY COURT ORDER." Disclosure of any copy of such deposition transcript or any document attached as a deposition exhibit shall be restricted to the deponent, his or her counsel of record, and persons designated in Paragraph 5. The Parties may disclose the Information to the Court in connection 12 8. with motions filed in this case or at trial in this case. The Information will be provided to the Court in a sealed envelope and will be marked "Confidential: Subject to Protective Order." The Court will decide whether to seal the Information and all references to the information in any other documents, or in any reporter's transcript at the conclusion of the litigation. Any requests of under stal Filing shall comply with local Pule 79-5. 18 Production of the documents or disclosure of the Information protected 19 by this Order shall not constitute a waiver of any confidentiality, privacy right or 20 privilege. Moreover, Defendants retain the right to assert all substantive objections 21 to the Information and/or documents containing the Information, including but not

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CASE NO. EDCV 07-1512 SGL (OPX) STIP, CONF. AGREEMENT & [PROPOSED] PROTECTIVE ORDER

ATTORNEYS AT LAW

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limited to relevancy, hearsay, privacy and privilege.

1 10. Any part of the Information may be removed from the scope of this 2 Order by agreement of the Parties or by Court order. 3 4 11. Should any Party violate the terms of this Order, and should legal action be necessary as a result of any violation or threatened violation of this Order, 5 the prevailing Party shall recover any damages allowed under the law. б 7 8 12. Notwithstanding anything to the contrary contained herein, any Party may move for a modification of this Order at any time that the interests of justice 10 appear to so require. Further, nothing in this Order shall be construed as affecting the Parties' obligations with respect to the Information as required by law. 11 12 13 13. This Order shall be binding on any and all Parties. 111 14 111 15 16 111 17 111 111 18 111 19 20 111 21 111 22 111 23 111 24 /// 25 /// 26 111 27 111 28 111 CASE NO. EDCV 07-1512 SGL (OPX) BURKE, WILLIAMS & - 5 -SORENSEN, LLP STIP. CONF. AGREEMENT & [PROPOSED] LA #4824-5357-9779 v1 ATTORNEYS AT LAW PROTECTIVE ORDER LOS ANGELES

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1		STIPULATION
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3	The parties hereto, through	their respective counsel, stipulate to entry of the
4	foregoing protective order.	- · · · · · · · · · · · · · · · · · · ·
5		
6	DATED: February \$2009	LAW OFFICES OF CHARLES J.
7		FLEISHMAN CHARLES J. FLEISHMAN
8		PAUL A. FLEISHMAN
9		- DI Fline
10		By: CUAL A. FLEISMAN
		Attorneys for Plaintiff Janice Parker
12	DATED: February 2009	
13	DATED: February, 2009	BURKE, WILLIAMS & SORENSEN, LLP DANIEL W. MAGUIRE
14		EDITH S. SHEA
15		By: Ma
16		A PIDVANCE OF CHEEK
17		Attorneys for Vulcan Materials Company Long Term Disability Plan
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BURKE, WILLIAMS & SORENSEN, LLP ATTORNEYS AT LAW	LA #4824-5357-9779 vl	CASE NO. EDCV 07-1512 SGL (OPX) -6- STIP. CONF. AGREEMENT & [PROPOSED]

STIP. CONF. AGREEMENT & [PROPOSED] PROTECTIVE ORDER

ATTORNEYS AT LAW LOS ANGRESS

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1	ORDER
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3	IT IS SO ORDERED.
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5	Dated: 2/29/09
6	Magistrate Judge, United States District Court
7	Court
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BURKE, WILLIAMS & SORENSEN, LLP ATTORNEYS AT LAW LOS ANGELES

LA #4824-5357-9779 v1

EXHIBIT 1 UNDERSTANDING AND AGREEMENT PURSUANT TO PROTECTIVE ORDER I hereby state that I have read a copy of the Stipulated Protective Order in Janice Parker v. Vulcan Materials Company Long Term Disability Plan, Case No. EDCV 07-1512 SGL (OPx), pending in the United States District Court of the Central District of California. I understand and agree to be bound by its terms. Dated: **SIGNATURE PRINTED NAME ADDRESS**

BURKE, WILLIAMS &
SORENSEN, LLP
ATTORNEYS AT LAW
LOS ANGELES

LA #4824-5357-9779 v1

CASE NO. EDCV 07-1512 SGL (OPX)
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