



1           1.     All documents produced or information disclosed and any other  
2 documents or records designated as “confidential” by the Defendant shall be  
3 revealed only to Plaintiff, counsel of record in this case, paralegals and secretarial  
4 employees under counsel’s direct supervision, and such persons as are employed  
5 by counsel to act as experts in this action. The information considered as  
6 “confidential” and disclosed only in accord with the terms of this paragraph shall  
7 include, without limitation, all of the Defendant’s policies and procedures, as well  
8 as personnel records, including disciplinary records, identity, or any other  
9 information or documentation supplied by the Defendant in response to Plaintiff’s  
10 Interrogatories or Requests for Production.

11           2.     Counsel for Plaintiff shall use all documents and information  
12 produced or disclosed by the Defendant solely for the purposes of preparation for  
13 and trial of this action. Under no circumstances shall information or materials  
14 covered by this Protective Order be disclosed to anyone other than Plaintiff’s  
15 counsel of record in this action, paralegals, secretarial employees under counsel’s  
16 direct supervision, and such persons employed to act as experts in this action. At  
17 the conclusion of the proceedings in this action, all documents and information  
18 subject to this Order, including any copies or extracts or summaries thereof, or  
19 documents containing information taken therefrom, shall be returned to counsel  
20 for the Defendant.

21           3.     Prior to disclosure of any documents designated as “confidential” to  
22 paralegals or secretarial employees of counsel or Plaintiff, counsel for Plaintiff  
23 shall require such employees to read this Protective Order and agree to be bound  
24 by its terms.

25           4.     If counsel for Plaintiff determines that for purposes of this action,  
26 documents or information produced by the Defendant and designated as  
27 “confidential” must be revealed to a person employed to act as an expert in this  
28 action, then counsel may reveal the designated documents or information to such

1 person, after first complying with the following:

2 (a) Counsel for the Plaintiff shall have the expert read this Order and  
3 shall explain the contents thereof to such expert.

4 (b) Counsel for the Plaintiff shall require such expert to sign a copy of  
5 this protective order that states: "I have read and understood the terms  
6 of this protective order. I further agree to be bound by its terms."  
7 Nothing in this paragraph shall be deemed to enlarge the right of  
8 Defendant to conduct discovery of any of Plaintiff's experts, except  
9 solely with respect to the ability of such expert to protect confidential  
10 information and documents from re-disclosure.

11 5. In accordance with Local Rule 79-5.1, any papers filed with the Court  
12 that contain information that has been designated as "Confidential" or "Attorneys'  
13 Eyes Only," shall be accompanied by an application to file the papers or the  
14 portion thereof containing the designated information under seal; and the  
15 application shall be directed to the judge to whom the papers are directed. For  
16 motions, the parties shall file a redacted version of the motion and supporting  
17 papers.

18 6. At the conclusion of the proceedings in this action, all documents and  
19 information subject to this Order, including any copies or extracts or summaries  
20 thereof, or documents containing information taken therefrom, shall be returned to  
21 counsel for the Defendant.

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