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 12 VRIES and RANDY DE VRIES

13 **UNITED STATES DISTRICT COURT**
 14 **CENTRAL DISTRICT OF CALIFORNIA**

15 BERNADETTE BLACKWOOD,
 16 individually and as guardian ad litem for
 17 K.B. and E.B; et al.;

18 Plaintiffs,

19 v.

20 MARY DE VRIES, individually and
 21 dba
 22 N&M DAIRY (aka N&M DAIRY # 1
 23 and N&M DAIRY # 2) and as trustee of
 24 the NEIL AND MARY DE VRIES
 25 FAMILY TRUST; et al.;

26 Defendants.

Case No.: 5:14-cv-00395-JGB-SP

PROTECTIVE ORDER

[NOTE CHANGE MADE BY THE
 COURT TO ¶ 3(e)]

ORDER

Good cause appearing therefor, it is ORDERED as follows:

1. All Well Completion Reports shall be discoverable in this action, notwithstanding any objections based on privacy, confidentiality, Water Code §13752, or other limitations.

1 2. The DWR shall mark any documents or data that it produces as
2 “CONFIDENTIAL” prominently on the front page of each such document.

3 3. Any document or data marked “CONFIDENTIAL” shall be treated as
4 follows:

5 (a) the document or data may be used only for purposes of this litigation;

6 (b) it may not be disclosed to anyone who is not a party to this litigation, an
7 expert or a consultant retained by a party to this litigation, an attorney for a party, or an
8 employee of one of the above;

9 (c) any copy of the document shall contain the “CONFIDENTIAL” mark on
10 it;

11 (d) within 30 days of the conclusion of the litigation, all copies of the
12 confidential documents or data must be returned to DWR or destroyed, and the Parties
13 must each inform DWR, and each other, in writing that this obligation has been
14 satisfied;

15 (e) if filed and/or lodged in the above action, the document shall be filed
16 and/or lodged with a sealing application pursuant to Local Rule 79-5;

17 (f) the document shall not be disclosed to any person, other than the Parties,
18 their counsel of record, or any employee of one of the Parties or their attorneys of
19 record, who has not completed and signed the non-disclosure agreement attached hereto
20 as Exhibit A.

21 4. The Parties and their attorneys of record shall complete and sign the non-
22 disclosure agreement attached hereto as Exhibit A.

23 5. The Parties shall keep a record of any person who has signed a non-
24 disclosure agreement pursuant to paragraph 3(f) above, and provide such record to
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1 DWR upon request.

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Date: April 28, 2015

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Copies to counsel of record

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The Honorable Sheri Pym
United States Magistrate Judge