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15 **UNITED STATES DISTRICT COURT**

16 **CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION**

17 RICHARD SINOHUI, on behalf of
 18 himself and all others similarly situated,

19 Plaintiffs,

20 vs.

21 CEC ENTERTAINMENT, INC., a
 22 Kansas corporation; and DOES 1
 23 through 100, inclusive.

24 Defendant.

Case No. 5:14-cv-02516-JLS (KKx)

[Assigned to Hon. Josephine L. Stanton]

**STIPULATION AND ~~[PROPOSED]~~
 PROTECTIVE ORDER RE
 DISCOVERY OF IDENTITIES OF
 CLASS MEMBERS**

Action Filed: October 10, 2014

1 In this lawsuit, Plaintiff, Richard Sinohui (“Plaintiff”), on behalf of himself
2 and other current and former employees and the general public, seek damages and
3 other relief against Defendant, CEC Entertainment, Inc. (“Defendant”), for alleged
4 violations of the California *Labor Code* and other unlawful business practices
5 alleged in his complaint. During discovery, Plaintiff requested that Defendant
6 identify all putative class members during the relevant time period. Defendant
7 objected to providing this information based on the privacy protections of Article I,
8 Section I of the California Constitution, among other reasons. The parties met and
9 conferred about the information sought and agreed to a method balancing the
10 Plaintiff’s need for the information and the privacy rights of the Defendant and
11 third parties concerned.

12 **THEREFORE, IT IS HEREBY STIPULATED** by and between Plaintiff,
13 by and through his counsel of record, James M. Trush of the Trush Law Office,
14 APC. and Todd H. Harrison of Perona, Langer, Beck, Serbin, Mendoza &
15 Harrison, APC., and Defendant, by and through its counsel of record, Gary M.
16 McLaughlin of Akin Gump Strauss Hauer & Feld, LLP., as follows:

17 1. Kurtzman Carson Consultants (“KCC” or ‘the Administrator”), a third
18 party administrator shall mail the letter attached as Exhibit “A” to all of
19 Defendant’s current and former employees who may be members of the putative
20 classes alleged in the complaint. Defendant will provide to the Administrator the
21 names, last known addresses and last known telephone numbers (to the extent
22 available) within ten (10) calendar days after written notice of the order on this
23 stipulation;

24 2. If an individual identified above does not want his/her address or
25 telephone number to be provided to the Plaintiffs, he/she may sign and return the
26 postage-prepaid postcard attached as Exhibit “B”;

27 ///
28

1 3. Thirty (30) days after mailing Exhibit “A,” the Administrator shall
2 provide Plaintiff with the names, addresses and telephone numbers of all current
3 and former employees who may be a member of the classes alleged in the
4 complaint and who did not sign and return the postcard attached as Exhibit “B”.
5 The Administrator shall provide Defendant with a list of those class members who
6 did sign and return the postcard;

7 4. Plaintiff’s representatives may contact the individuals to discover
8 whether they have knowledge of the alleged *Labor Code* violations and alleged
9 unfair business practices;

10 5. Plaintiff shall keep the names and contact information of putative
11 class members and any information discovered by this process confidential, and
12 shall use such information only for purposes of investigating, prosecuting and/or
13 settlement of this litigation only, such information to be treated as Confidential
14 information under the parties’ Stipulated Protective Order; and

15 6. The parties agree that this procedure is consistent with *Belaire-West*
16 *Landscape, Inc. v. Sup. Ct.* (2007) 149 Cal.App.4th 554.

17
18 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.** ¹

19
20 Dated: June 16, 2015

AKIN GUMP STRAUSS HAUER &
FELD, LLP
GARY M. MCLAUGHLIN

21
22
23 By: _____ //s//

24 Gary M. McLaughlin
25 Attorneys for Defendant,
26 CEC ENTERTAINMENT, INC.

27
28 _____
¹ Pursuant to Local Rule 5-4.3.4(a)(2), the filing party has obtained the
authorization and approval of all signatories listed to file this stipulation.

