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22 **UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

23 DON HENLEY and MIKE  
 24 CAMPBELL,  
 25 Plaintiffs,  
 v.  
 26 CHARLES S. DEVORE and  
 JUSTIN HART,  
 27 Defendants.

Case No. SACV09-0481 JVS (RNBx)

Hon. James V. Selna

**STIPULATION REGARDING**  
**[PROPOSED] PROTECTIVE**  
**ORDER FOR DISCOVERY**

28

1 The discovery procedures in this case may require disclosure of information  
2 regarded by the producing party as confidential information incorporating private,  
3 trade secret, and/or proprietary business information. Accordingly, pursuant to  
4 Rule 26(c) of the Federal Rules of Civil Procedure, the parties by and through their  
5 respective attorneys, stipulate and agree, subject to the approval of the Court, to the  
6 entry of the protective order (the “Protective Order”) attached hereto as Exhibit A,  
7 which will apply to the exchange of confidential information during discovery.

### 8 **GOOD CAUSE STATEMENT**

9 Unrestricted or unprotected disclosure of confidential commercial or personal  
10 information would result in substantial prejudice or harm to the disclosing party by  
11 revealing competitively sensitive and valuable confidential information, or by  
12 revealing private personal information to which a valid privacy interest pertains.  
13 Confidential information may constitute valuable tangible and intangible assets of a  
14 disclosing party, and unrestricted disclosure may destroy or significantly diminish  
15 such value. The privacy interest of the parties must be safeguarded. Furthermore,  
16 documents disclosed in the discovery procedures may also reveal the confidential  
17 information of third parties relating to their agreements, business dealings, and  
18 other interactions with one or more of the parties; the valid interests of non-parties  
19 to this litigation should be protected as well.

20 It is the intent of the parties that confidential materials produced in this case  
21 will not be designated “Confidential” or “Attorneys’ Eyes Only” for tactical reasons  
22 and that nothing will be designated as such without a good faith belief that good  
23 cause exists as to why it should not be part of the public record of this case.

24 Examples of confidential information that the parties may seek to protect  
25 from unrestricted or unprotected disclosure include:

26 (a) Information that is the subject of non-disclosure or confidentiality  
27 agreements or obligations with third parties;  
28

1 (b) Internal business or campaign-related material, which may reveal  
2 strategies relating to defendant DeVore’s political campaigns or other sensitive  
3 business practices, such as internal correspondence, campaign research, or strategy  
4 memoranda;

5 (c) Commercially sensitive proprietary and financial information, which  
6 may reveal revenues, royalties, profits, costs, margins, pricing, or trade secrets  
7 relating to a party or to third parties, such as documents reflecting proposals,  
8 negotiations, and agreements with third parties relating to licensing requests,  
9 royalty payments, and proposed artistic and commercial works of the parties or  
10 third parties seeking to license the Plaintiffs’ copyrighted works for use in such  
11 third parties’ proposed works and products; and

12 (d) Personal information concerning a party or a third party.

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Accordingly, the parties respectfully submit that there is good cause for the entry of the Protective Order.

IT IS SO STIPULATED.

Dated: September 16, 2009

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