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3 UNITED STATES DISTRICT COURT  
4 CENTRAL DISTRICT OF CALIFORNIA  
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6 **ROBERTO SILVA, individually and**  
7 **on behalf of those similarly situated,**

8 **Plaintiff,**

9 v.

10 **INTERNATIONAL BUSINESS**  
11 **MACHINES CORPORATION,**

12 **Defendant.**

Case No. SACV10-01282 CJC  
(JCGx)

~~PROPOSED~~ PROTECTIVE  
ORDER GOVERNING  
CONFIDENTIAL INFORMATION

NOTE CHANGES MADE BY THE COURT.

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14 Having review the parties' Stipulation Regarding Protective Order Governing  
15 Confidential Information, the Court hereby orders as follows:

16 1. As used herein, the phrase "Employee Names and Addresses" is  
17 defined as follows:

18 (a) The names and current or last known home addresses of current  
19 and former IBM employees who worked in California in a nonexempt position at  
20 any time from August 20, 2009 to June 9, 2011;

21 (b) The names and current or last known home addresses of current  
22 and former IBM employees who work or have worked in the United States in bands  
23 6-8 of position code 595K at any time from January 1, 2009 to June 9, 2011; and

24 (c) The names and current or last known home addresses of current  
25 and former California employees of IBM who have held a Workplace Indicator of  
26 "Work at Home" in IBM's HR system at any time from January 1, 2009 to June 9,  
27 2011.

28 2. Plaintiff's counsel agrees to use the Employee Names and Addresses

PROTECTIVE ORDER GOVERNING  
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