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NOTE CHANGES MADE BY THE COURT

10 Attorneys for Defendants
 FEDEX FREIGHT, INC. and
 11 FEDEX CORPORATION

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16 Attorneys for Plaintiff
 PAMELA STRATTON

17
 18 UNITED STATES DISTRICT COURT
 19 FOR THE CENTRAL DISTRICT OF CALIFORNIA

21 PAMELA STRATTON, an individual
 22 Plaintiff,
 23 vs.
 24 FEDEX FREIGHT, INC. an Arkansas
 corporation as successor in interest to
 25 FEDEX NATIONAL LTL, FEDEX
 CORPORATION, a Delaware corporation,
 26 and DOES 1-10,
 27 Defendant.

CASE NO.: SACV12-1417-JAK-(PJWx)
**STIPULATION RE: DISCLOSURE OF
 CONFIDENTIAL INFORMATION
 AND ORDER**

Complaint Filed: August 29, 2012
 Trial Date: None set

1 WHEREAS Plaintiff PAMELA STRATTON and Defendants FEDEX FREIGHT,
2 INC. and FEDEX CORPORATION (each referred to herein as

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(b) the Parties

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counsel and no partial or complete copies thereof containing

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1 11. Final Disposition. Within 45 calendar days of the final termination of the
2 action and at the written request of the designating or the producing person, all
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1 party shall be entitled to seek immediate injunctive relief by way of ex parte hearing or
2 otherwise as allowed by law or equity. The decision by the non-breaching party to seek
3 such injunctive relief will be without prejudice to any other rights or remedies, legal or
4 equitable, which the non-breaching party might have in the event of such a breach or
5 threatened breach and neither the seeking by the non-breaching party of any such relief
6 nor the obtaining by the non-breaching party of any other such relief will be a waiver or
7 release of any of the non-breaching party

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1 15. Stipulation. This Stipulation shall be deemed in full force and effect until
2 the court

22 IT IS SO ORDERED.

24 DATED: January 29, 2013



Hon. Patrick J. Walsh
United States Magistrate Judge

1 **EXHIBIT A**

2
3 **ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND**

4 I, _____ [print or type full name], of
5 _____ [print or type full address], declare under
6 penalty of perjury that I am a citizen or national of the United States, or am a lawful
7 permanent resident in the United States. I further declare that I have read in its entirety
8 and understand the Stipulated Protective Order that was issued by the United States
9 District Court for the Central District of California on [date] in the case of Pamela
10 Stratton v. FedEx Freight, Inc., FedEx National LTL, and FedEx Corporation, Case No.
11 SACV12-1417-JAK-(PJWx). I agree to comply with and to be bound by all the terms of
12 this Stipulated Protective Order and I understand and acknowledge that failure to so
13 comply could expose me to sanctions and punishment in the nature of contempt. I
14 solemnly promise that I will not disclose in any manner any information or item that is
15 subject to this Stipulated Protective Order to any person or entity except in strict
16 compliance with the provisions of this Order.

17 I further agree to submit to the jurisdiction of the United States District Court for
18 the Central District of California for the purpose of enforcing the terms of this Stipulated
19 Protective Order, even if such enforcement proceedings occur after termination of this
20 case.

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1 I hereby appoint _____ [print or type full name] of
2 _____ [print or type full
3 address and telephone number] as my California agent for service of process in
4 connection with this case or any proceedings related to enforcement of this Stipulated
5 Protective Order.

6 Date: _____

7 City and State where sworn and signed: _____

8 Printed Name: _____

9 Signature: _____

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