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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

CRISTINA TALLEY,

Plaintiff,

v.

CITY OF ANAHEIM, a  
municipality, and DOES 1 through  
50, inclusive,

Defendant.

Case No.: SACV 14-1863 DOC (GJSx)

Complaint Filed: November 25, 2014  
FAC Filed: January 26, 2015

**PROTECTIVE ORDER REGARDING  
DISCLOSURE OF VIDEO**

**(MODIFIED FROM STIPULATION)**

For good cause shown and based on the stipulation of the Parties, the Court hereby notes the recitals set forth in the Parties' stipulation and approves the proposed protective order (**as modified, infra**) as follows:

1. Plaintiff issued a discovery request for a video recording captured by the Anaheim Police Department of an incident that occurred on March 7, 2015 at Lookout Lane in the City of Anaheim.

2. Defendant City of Anaheim considers this police video recording to be a confidential record of a police investigation that is not subject to disclosure to the public pursuant to California Government Code section 6254, subdivision (f).

3. Defendant is willing to provide this video to Plaintiff to avoid a discovery motion provided that the use and/or disclosure of the police video is

1 strictly limited to the litigation.

2 4. The Video is the only document or item that is subject to this  
3 Protective Order.

4 5. Defendant shall produce the Video to Plaintiff upon Court's approval  
5 of the Protective Order.

6 6. The Parties agree that the Video shall be kept strictly confidential and  
7 may not be disclosed to anyone outside of this litigation. The Video may only be  
8 viewed by:

- 9 a. The attorneys for the Parties;
- 10 b. The Parties;
- 11 c. The attorneys' agents or employees; and
- 12 d. Experts, consultants, witnesses, court reporters, deponents, and  
13 court personnel.

14 The Video shall not be given, loaned, sold, or shown to any persons except as  
15 provided by this Order or subsequent order of this Court.

16 7. The Parties agree to notify the opposing Party if they intend to use the  
17 Video in any public proceeding in this case, including but not limited to attaching it  
18 as an exhibit to any motion, whether filed publicly or under seal, or using it at any  
19 hearing, trial, or other court proceeding.

20 8. The parties further acknowledge that this Stipulated Protective Order  
21 does not entitle them to file confidential information under seal; Local Civil Rule  
22 79-5 sets forth the procedures that must be followed and the standards that will be  
23 applied when a party seeks permission from the court to file material under seal.

24 9. All objections as to the admissibility or relevance of the Video are  
25 reserved and are not waived by any terms of the Stipulation and Order.

26 10. The Stipulation and Order do not preclude any party from bringing a  
27 motion to quash or modify a subpoena, a motion to compel documents, a motion for  
28 protective order, a motion in limine before trial to preclude the admission into

1 evidence of the Video, or any other type of motion related to the Video.

2 11. Unless otherwise provided by order of this Court, no additional copies  
3 of the Video, or any portion of the Video, shall be made without prior court order.

4 12. After the conclusion of this litigation (i.e., after final judgment and  
5 conclusion of any appeal), Plaintiff shall return the Video and any and all copies of  
6 the Video and any transcripts thereof to Defendant's counsel within 90 days.

7 13. Nothing in the Stipulation and this Order, nor the production of the  
8 Video under the terms of this Stipulation and Order, nor any proceedings pursuant  
9 to the Stipulation and this Order, shall be deemed to have the effect of an admission  
10 or waiver by either party of the confidentiality or admissibility of the Video or any  
11 documents or information or altering any existing obligation of any party.

12 14. This Order shall survive the final termination of this action. The Court  
13 shall retain jurisdiction to resolve any dispute concerning the disclosure or return of  
14 the Video.

15 15. The attorneys in this litigation agree to advise their clients, consultants,  
16 experts, and agents who are provided with a copy of the video of the contents of  
17 this Order and shall also provide a copy of this Order to them.

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20 IT IS SO ORDERED.

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22 Date: May 24, 2016



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24 GAIL J. STANDISH  
25 UNITED STATES DISTRICT COURT JUDGE  
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