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MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP
ATTORNEYS AT LAW

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

WENDI OPPENHEIMER, an individual, VANNES OPPENHEIMER, an individual, and JEFFREY PEREA, an individual,

Plaintiffs,

v.

THE CITY OF LA HABRA, a municipality; TANNA WILLIAMS, an individual; G4S SECURE SOLUTIONS (USA) INC., a Florida Corporation; and DOES 1-10, inclusive,

Defendants.

Case No. SACV16-0018 JVS (DFMx)

[Hon. James V. Selna; Magistrate Judge Douglas F. McCormick]

PROTECTIVE ORDER

Plaintiffs WENDI OPPENHEIMER, VANNES OPPENHEIMER and JEFFREY PEREA, through their counsel of record herein, Brown White & Osborn LLP, and defendants CITY OF LA HABRA, TANNA WILLIAMS, and G4S SECURE SOLUTIONS (USA) INC., through their counsel of record herein, Manning & Kass, Ellrod, Ramirez and Trester, LLP, submitted a Joint Stipulation for Protective Order before this Court.

The Court has read and considered all of the papers filed in support of this stipulation. Good cause appearing, this Court makes the following orders.

1 **IT IS THEREFORE ORDERED** that the Joint Stipulation for Protective
2 Order Thereon is **GRANTED** as follows:

3 **TERMS OF THE PROTECTIVE ORDER**

4 The parties' counsel shall have sole custody and control over the documents
5 identified in paragraph 1 of the Stipulation and Order.

6 Documents set forth in paragraph 1 of the Stipulation and Order are deemed
7 confidential, except to the extent set forth in that document, and shall be used solely
8 in connection with this litigation and the preparation and trial of this case, or any
9 related appellate proceedings, and not for any other purpose, including any other
10 litigation, and may not be disclosed or disseminated to other persons, including any
11 other counsel other than as set forth herein;

12 The parties' counsel alone will have custody, control and access to the
13 documents, reports and writings, and will be prohibited from releasing or
14 disseminating the reports or files, or the information contained within the reports or
15 files to other persons including legal counsel other than set forth in paragraph 12 of
16 the Stipulation and Order;

17 The parties' counsel may make copies of the reports and files, but counsel will
18 be prohibited from releasing or disseminating such copies or the information
19 contained within such copies other than as set forth herein;

20 The documents identified in paragraph 1 may be submitted in all law and
21 motion proceedings if done so pursuant to Local Rule 79-5. This Order does not
22 apply to those exhibits deemed admissible at trial (as those will be merely lodged
23 and not made part of the public record), though it does apply to any motion or
24 pleading filed during the duration of the lawsuit.

25 All disputes regarding this Order shall be handled pursuant to Local Rule 37.

26 The documents may be disclosed to the following persons:

- 27 (a) counsel for any party to this action;
- 28 (b) paralegal, stenographic, clerical and secretarial personnel

1 regularly employed by counsel referred to in paragraph (a);

2 (c) court personnel including stenographic reporters engaged in such
3 proceedings as are necessary incident to preparation for the trial in this action;

4 (d) any outside expert or consultant retained in connection with this
5 action, and not otherwise employed by either parties (including jury consultants);

6 (e) any “in-house” or outside experts designated by the defendants
7 to testify at trial in this matter;

8 (f) any party to this action or employees of any party, the sole
9 exception being the documents from the G4S and City of Long Beach personnel
10 files of Tanna Williams which may not be shown to the plaintiffs.

11 Any documents so disclosed will explicitly require inclusion of a copy of the
12 Stipulation and Order and this Order and written instructions from counsel directing
13 compliance with same.

14 If, in connection with any deposition taken in this action, counsel for the
15 parties question a witness regarding materials subject to this Order, or uses
16 confidential material as deposition exhibits, at the request of the opposing counsel,
17 the transcripts of such deposition testimony and the attached exhibits shall be
18 designated as confidential material and shall be subject to the provisions of this
19 Order.

20 The parties' decision to enter into this Stipulation and Protective Order is
21 made without waiver of the privileges and rights afforded to them, including, but not
22 limited to, the right to privacy embodied by the United States Constitution or the
23 right to object at the time of trial to the admissibility of such or to preclude any party
24 from filing pre-trial motions with regard to the admissibility thereof or the
25 information contained therein.


26 The parties' counsel agree to maintain the documents in agreement with the
27 terms of this Stipulation and Order.

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1 The provisions of this Order shall be in effect until further Order of the Court
2 or Stipulation by counsel for the parties.

3 **IT IS SO ORDERED.**

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5 DATED: August 10, 2016



6 Hon. Douglas F. McCormick
7 United States Magistrate Judge

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