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

ASHLEY LANGLEY,)
)
Plaintiff,)
)
v.)
COUNTY OF ORANGE, a public)
entity, CLAUDIA RIVERA, an)
individual; CAROL TAYLOR, an)
individual; NIKOLE SEALS, an)
individual; LAURI LUCHONOK, an)
individual; CAROL BUTZKE, an)
individual; SUSAN HOLL, an)
individual; VERONICA ZUNIGA, an)
individual; JAMES WALDRON, an)
individual; GABRIEL J. BOWNE, an)
individual; CITY OF NEWPORT)
BEACH, a public entity; PENNY)
FREEMAN, an individual; DON)
PROUTY, an individual; and DOES 1-)
10, inclusive,)
Defendants.)

Case No. 8:16-cv-00538

**[PROPOSED] PROTECTIVE ORDER
REGARDING JUVENILE CASE
FILES AND LAW ENFORCEMENT
FILES SUBJECT TO CALIFORNIA
WELFARE AND INSTITUTIONS
CODE §§ 827 AND 828, AND ANY
RELATED DOCUMENTS**

1 COMES NOW, the Court upon review of the stipulation of the parties and
2 upon good cause being shown, entering the following as the Order of the Court in
3 the above entitled matter:

4 1. Any documents consisting of the Juvenile Case File (as defined by
5 California Rule of Court 5.552), which includes the County of Orange Superior
6 Court Juvenile Court Files, records and transcripts and the County of Orange
7 Children and Family Services Agencies files and records, including electronically
8 stored information received by any of the parties in response to petitions under
9 California Welfare Institutions Code Section 827 and 828 (as to law enforcement
10 files and records) and during discovery during this matter will be subject to this
11 Protective Order and the Federal Rules of Civil Procedure and federal case law.
12 Any such files will be identified by uniformly bate stamped for use by the parties in
13 this matter. Said documents and records may be used by and/or transmitted to,
14 counsel for the parties in this matter, their office staff and employees necessary to
15 their representation of their clients, to any party and their representatives, to any
16 experts, to any witnesses, and to those individuals necessary for carrying out the
17 duties and responsibilities necessary to this litigation.

18 2. No Juvenile Case File and any related law enforcement documents,
19 records, transcripts and files shall be attached or made part of the public record in
20 this civil action, or shall be made accessible to the public. If a party wishes to file
21 any such document, the document must be filed under seal. The parties shall follow
22 and abide by applicable laws and the U.S. District Court, Central District Policies
23 and Procedures and the Court's chambers rules, with respect to filing documents
24 under seal.

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3. The Court may modify this protective order for good cause shown, in the interests of justice, and/or for public policy reasons.

IT IS SO ORDERED,

DATED: September 11, 2017

/S/ FREDERICK F. MUMM
FREDERICK F. MUMM
United States Magistrate Judge