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 2 **COUNTY OF KERN, STATE OF CALIFORNIA**
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8 **Attorney for Defendants, COUNTY OF KERN, et al.**

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 12 **UNITED STATES DISTRICT COURT**
 13 **EASTERN DISTRICT OF CALIFORNIA**

14 **JOHN STOLL,**
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 16 **Plaintiff,**
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 18 **v.**
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 20 **COUNTY OF KERN, EDWARD**
 21 **LAWRENCE KLEIER, deceased, and**
 22 **his surviving spouse, BARBARA B.**
 23 **KLEIER, VELDA MURILLO, BRADFORD**
 24 **JAMES DARLING, CONNY ERICSSON,**
 25 **CAROL DARLING, and DOES 1 - 30,**
 26 **inclusive,**
 27 **Defendants.**

28 **CASE NO. 1:05-CV-01059 OWW SMS**

STIPULATION FOR PROTECTIVE
ORDER RE PEACE OFFICER
PERSONNEL RECORDS; ORDER

29 **STIPULATION**

30 The parties, by and through their attorneys of record, hereby stipulate:

- 31 1. Plaintiff has requested the production of peace officer personnel records in
 32 the form of training records for certain individuals who served as investigators of child
 33 sexual abuse in the Kern County Sheriff's Department.
- 34 2. Defendant County of Kern is willing to disclose such records provided an
 35 appropriate protective order is issued by the court.
- 36 3. Plaintiff is willing to enter into a protective order with respect to the training
 37 records.
- 38 4. The parties agree that the training records to be produced by defendant for
 inspection and copying by plaintiff shall be subject to the protective order stated below.

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Dated: April 21, 2009

Office of Kern County Counsel

By /s/ Mark L. Nations
Mark L. Nations, Chief Deputy
Attorney for defendants Kern County,
Lawrence Kleier, Brad Darling and Carol
Darling

Dated: April 20, 2009

Robinson and Kellar, Attorneys

By /s/ Oliver U. Robinson
Oliver U. Robinson, Esq.
Attorney for defendants Velda Murillo
and Conny Ericsson

Dated: April 20, 2009

Law Office of Laurence O. Masson

By /s/ Laurence O. Masson
Laurence O. Masson, Esq.
Attorney for Plaintiff

PROTECTIVE ORDER

The parties having stipulated thereto and good cause appearing therefore, IT IS
HEREBY ORDERED, that the training records (Records) identified by defendant in
discovery shall be produced for inspection and copying by plaintiff subject to the following
protections:

1. The Records shall not be copied or disseminated outside of any attorney's
office except for review by retained experts whose opinions depend to some degree on the
content of the subject Records.
2. The only persons who shall be authorized to view the Records will be the
attorneys, the attorneys' office staff, retained experts, court staff and parties to the action.
3. All copies of the Records shall be returned to counsel for defendant at the
conclusion of the litigation.

1 4. The Records shall not be used for any purpose outside this litigation and
2 neither the Records nor their contents shall be disclosed to the news media.

3 5. The records to be produced do not need to be lodged, submitted or filed
4 under seal for purposes of motions or trial.

5 6. Any person violating this order shall be subject to sanctions.

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7 IT IS SO ORDERED.

8 **Dated:** April 27, 2009

/s/ Sandra M. Snyder
UNITED STATES MAGISTRATE JUDGE

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