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GERAWAN FARMING, INC.

[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

DELANO FARMS COMPANY; FOUR STAR
FRUIT, INC.; GERAWAN FARMING, INC.,

Plaintiffs,

vs.

THE CALIFORNIA TALE GRAPE
COMMISSION; UNITED STATES OF
AMERICA; UNITED STATES DEPARTMENT
OF AGRICULTURE; TOM VILSACK,
SECRETARY OF AGRICULTURE (IN HIS
OFFICIAL CAPACITY)

Defendants.

Case No. 1:07-cv-01610-LJO-JLT

**STIPULATED PROTECTIVE ORDER –
AMNESTY DOCUMENTS**

1 WHEREAS this Court has ordered the California Table Grape Commission (the
2 “Commission”) to produce unredacted copies of documents (the “Amnesty Documents”) relating to
3 18 growers (the “Amnesty Growers”) who participated in the Commission’s “amnesty” program for
4 growers in possible possession of United States Department of Agriculture-developed table grape
5 varieties before their official release, *see* Dkt. No. 176;

6 WHEREAS the Commission promised Amnesty Growers confidentiality, and certain of the
7 Amnesty Growers have objected to release of their identifying information;

8 WHEREAS the Amnesty Documents may contain information that the Amnesty Growers
9 consider personal or confidential;

10 WHEREAS the parties agree that the Amnesty Documents, upon production in unredacted
11 form, should be designated and treated as “Confidential” pursuant to the Stipulated Protective Order
12 filed by the parties on March 22, 2012 (Dkt. No. 154) and granted by the Court on March 23, 2012
13 (Dkt. No. 155); and

14 WHEREAS the Court has informed the parties that only upon the showing required by Local
15 Rules 141. 141.1 will the Court consider a request by any party to file this information under seal;

16 IT IS HEREBY STIPULATED AND AGREED, by and among Plaintiffs Delano Farms
17 Company, Four Star Fruit, Inc. and Gerawan Farming, Inc., the Commission, and Defendants United
18 States of America, United States Department of Agriculture, and Tom Vilsack, Secretary of
19 Agriculture that—subject to approval of the Court—the Amnesty Documents be designated and
20 treated as “Confidential” pursuant to the Stipulated Protective Order filed by the parties on March
21 22, 2012 (Dkt. No. 154) and granted by the Court on March 23, 2012 (Dkt. No. 155).

22 ACCEPTED AND AGREED.
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1 DATED: August 7, 2012

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/s/ Lawrence M. Hadley (as authorized 8-7-12)
By _____
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12 By _____
13 John Fargo

14 Attorneys for Defendants
15 THE UNITED STATES OF AMERICA, THE
16 UNITED STATES DEPARTMENT OF
17 AGRICULTURE, AND TOM VILSACK

18 IT IS SO ORDERED.

19 Dated: August 8, 2012

20 /s/ Jennifer L. Thurston
21 UNITED STATES MAGISTRATE JUDGE