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16 **UNITED STATES DISTRICT COURT**  
17 **EASTERN DISTRICT OF CALIFORNIA**

18 PERINATAL MEDICAL GROUP, INC.,  
19 KRISHNAKUMAR RAJANI, M.D., and  
20 STEPHEN ELLIOT, M.D.

21 Plaintiffs,

22 v.

23 CHILDREN'S HOSPITAL CENTRAL  
24 CALIFORNIA, INC., a California  
25 Corporation, a California Corporation;  
26 SPECIALITY MEDICAL GROUP  
27 CENTRAL CALIFORNIA, INC., a  
28 California professional medical  
corporation; and CALIFORNIA  
NEONATOLOGY GROUP, INC., a  
California professional medical  
corporation

Defendants.

Case No.1:09-CV-01273 LJO MJS

**STIPULATION REGARDING  
AMENDMENT TO STIPULATED  
PROTECTIVE ORDER AND  
ORDER THEREON**

29 The parties have previously entered into a Protective Order in this case, a copy of which  
30 is attached hereto as Exhibit A. The Protective Order has been previously amended, a copy of  
31 which is attached hereto as Exhibit B.

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1 Discovery is being propounded to third parties. The parties desire to further amend the  
2 Protective Order to address issues raised by third parties in connection with the subpoenas. To  
3 that end, the parties propose to amend the Protective Order to provide that "Parties" as defined  
4 in the Protective Order also include third parties who will or do produce documents in this  
5 action.

6 DATED: 3/31/2011

7 By: /s/ William C. Haesy  
8 William C. Haesy,  
9 Attorneys for Defendant,  
10 CHILDRENS' HOSPITAL CENTRAL  
11 CALIFORNIA

12 DATED: 3/24/2010

13 DAVIS WRIGHT TREMAINE, LLP

14 By: /s/ Charles S. Wright  
15 Charles S. Wright,  
16 Attorneys for Defendant,  
17 CHILDRENS' HOSPITAL CENTRAL  
18 CALIFORNIA

19 DATED: March 22, 2011

20 CHRISTENSEN & AUER

21 By: /s/ Stephen G. Auer  
22 Stephen Auer,  
23 Attorneys for Plaintiffs

24 DATED: 3/30/11

25 COLEMAN & HOROWITT, LLP

26 By: /s/ Darryl J. Horowitt  
27 Darryl J. Horowitt,  
28 Attorneys for Plaintiffs

DATED: 3-28-11

DOERKSEN TAYLOR LLP

By: /s/ Charles L. Doerksen  
Charles L. Doerksen,  
Attorneys for Defendant,  
CENTRAL CALIFORNIA NEONATOLOGY, INC.

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DATED: 3/29/11

ATKINSON, ANDELSON, LOYA, RUDD & ROMO

By: /s/ William M. Woolman

William M. Woolman,  
Attorneys for Defendant,  
SPECIALTY MEDICAL GROUP CENTRAL  
CALIFORNIA, INC.

DATED: 3/28/2011

FISHMAN, LARSEN, GOLDRING & ZEITLER

By: /s/ Michael W. Goldring

Michael W. Goldring,  
Attorneys for Defendant,  
CENTRAL CALIFORNIA NEONATOLOGY, INC

ORDER

The Court having reviewed the foregoing stipulation and good cause appearing therefor :

IT IS HEREBY ORDERED that:

The Protective Order be further amended to provide that "Parties" as defined in the Protective Order includes third parties who will or do produce documents in this action.

IT IS SO ORDERED.

Dated: March 31, 2011

/s/ Michael J. Seng  
UNITED STATES MAGISTRATE JUDGE