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10 UNITED STATES DISTRICT COURT  
 11 EASTERN DISTRICT OF CALIFORNIA

11 DEANNA RANGEL,	)	<b>Case No. 1:09-CV-01467-AWI-GSA</b>
	)	
12 Plaintiff,	)	
	)	
13 vs.	)	<b>PROTECTIVE ORDER</b>
	)	
14 AMERICAN MEDICAL RESPONSE WEST, a	)	
15 California corporation, JOSE MARTINEZ, an	)	
16 individual (as to GC §12940 and Defamation	)	<b>Complaint Filed: August 20, 2009</b>
17 only), and TRACY J. FISHER, an individual	)	<b>Trial Date: July 19, 2011</b>
18 (Defamation only)	)	
	)	
19 Defendants.	)	
	)	

20 **PROPOSED PROTECTIVE ORDER**

21 Whereas, Defendant, JOSE MARTINEZ, (hereinafter referred to as “Martinez”) has served  
 22 subpoenas for business records on Plaintiff’s medical providers, requesting production of documents  
 23 concerning her medical treatment, the Court has ordered that the subpoenaed parties comply with these  
 24 requests, subject to the execution of the following Protective Order:

25 **IT IS HEREBY ORDERED THAT:**

- 26 1. Documents produced in the course of this litigation by Plaintiff’s medical providers  
 27 shall be kept confidential by the parties, shall not be disclosed to any person who is not  
 28 a Qualified Person as defined below or as provided in 3 below, and shall be used  
 solely for the purpose of this litigation.

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- 2. “Document” as used herein means any type or classification of document and includes all information contained in a document or E-mail.
  
- 3. “Qualified Person” as used herein means:
  - A. Attorneys of record and employees of such attorneys to whom it is necessary that the material be shown for purposes of this litigation, including Experts and Consultants.
  - B. Individuals who are a party, or designated representative(s) of a corporate party to this litigation; and
  - C. Any person retained by a party or its attorneys of record in this litigation for trial, such as technical experts and consultants; and
  - D. Any other person who is designated as a Qualified Person by Order of this Court, after notice of all parties.
  
- 4. The documents identified in 1 and 2 above shall not be made available to persons other than Qualified Persons, or to the party who produced the document, or to any person or party who is the proprietor or source of the document, except in the course of deposition, interrogatory or other discovery pleading or trial when inquiry can be made and disclosure of documents allowed for the purpose of inquiry concerning a document, information a document contains, or actions of a witness or others relative to the document or information it contains.
  
- 5. Whenever any document or material obtained from Plaintiff’s medical providers is used or submitted to the court in conjunction with any filing or proceeding in this litigation, it shall be marked “confidential” and shall be filed separately under seal with the Clerk of the Court consistent with the filing procedures for the court.
  
- 5. Nothing shall prevent disclosure beyond the terms of this Order if the party producing the document expressly consents to such disclosure, either in writing or in the record of any proceeding in this case, or if the Court, after notice to all parties, orders such disclosure.

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