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21 Attorneys for Defendants
22 Corrections Corporation of America and
23 CCA of Tennessee, LLC

24 **UNITED STATES DISTRICT COURT**
25 **EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**

26 TERRY SANDRES, an individual,
27
28 Plaintiff,

vs.

CORRECTIONS CORPORATION OF
AMERICA, a Maryland corporation; and Does 1
through 50, inclusive,

Defendants.

CASE NO. 1:09-cv-01609 OWW-JLT

Assigned to: Hon. Oliver W. Wanger/Room
3

**STIPULATED PROTECTIVE ORDER
FOR CONTACT INFORMATION OF
DEFENDANTS' EMPLOYEES**

District Judge: Oliver W. Wanger
Magistrate Judge: Jennifer L. Thurston
Action filed: July 24, 2009
Trial Date: August 30, 2011

1 WHEREAS, on February 4, 2011, the Court ordered that Defendants CCA of Tennessee,
2 LLC (“Defendants”) provide Plaintiff Terry Sandres (“Plaintiff”) with the last known contact
3 information for certain employees and former employees of Defendants;

4 WHEREAS, as a condition of this disclosure, the Court ordered that the parties submit a
5 stipulated protective order to the Court limiting the disclosure of this contact information;

6 THE PARTIES THEREFORE STIPULATE AND AGREE AS FOLLOWS:

7 1. For the purposes of this Stipulation and Order the term CONFIDENTIAL INFORMATION
8 shall mean: the last known addresses and telephone numbers for all employees and former
9 employees of Defendants (“CCA Employees”) which have been requested through special
10 interrogatories and produced pursuant to the court’s order.

11 2. Defendants shall provide the CONFIDENTIAL INFORMATION within one court day of
12 the Court’s order on this Stipulation.

13 3. The CONFIDENTIAL INFORMATION shall not be disclosed to any person except:
14 a. the parties’ respective counsel of record;
15 b. other persons employed, consulted or retained by the parties’ respective counsel of
16 record;
17 c. court reporters; and
18 d. the Court or court personnel.

19 Disclosure may be made subject to the terms and conditions set forth in the Stipulation
20 only. The parties’ respective counsel of record shall assure that the persons enumerated above
21 shall strictly maintain the confidentiality of the CONFIDENTIAL INFORMATION. Moreover,
22 the parties specifically agree that the CONFIDENTIAL INFORMATION shall not be used or
23 disclosed by the parties’ counsel of record other than in connection with this litigation and shall not
24 be used by the parties’ counsel of record in any other proceeding, except as compelled by legal
25 process.

26 4. Upon final determination of this litigation, any party that has received from the other party
27 CONFIDENTIAL INFORMATION shall promptly destroy the CONFIDENTIAL
28 INFORMATION and notify the producing party thereof.

1 5. Neither this Stipulation, nor any action taken by any attorney pursuant to this Stipulation,
2 shall be deemed to have the effect of any admission or waiver by any party hereto or of altering the
3 confidentiality of the CONFIDENTIAL INFORMATION.

4 6. The court reporter or any other person preparing either full deposition transcripts or
5 portions of deposition transcripts in which CONFIDENTIAL INFORMATION are marked as
6 exhibits shall be instructed not to furnish copies of the CONFIDENTIAL INFORMATION to any
7 person not authorized under the terms of this Stipulation to have access to CONFIDENTIAL
8 INFORMATION.

9 7. This Stipulation shall be without prejudice to the right of the parties to bring before the
10 Court at any time the question of whether any information is confidential, relevant and/or protected
11 by a right of privacy or whether its use should be restricted.

12 8. In addition, Plaintiff's counsel (including his partners or employees) may use this
13 CONFIDENTIAL INFORMATION for the purpose of directly contacting such CCA employees.
14

15 Dated: February 7, 2011

APPELL | HILAIRE | BENARDO LLP

16
17 By _____/s/ BARRY APPELL_____
Barry Appell
Attorney for Plaintiff

18
19 Dated: February 7, 2011

GLEASON & FAVAROTE, LLP

20
21 By _____/s/ RICHARD CHEN_____
Richard Chen
Attorney for Defendants

22
23
24 IT IS SO ORDERED.

25 Dated: February 8, 2011

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE