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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ANNA GREER,

Plaintiff,

v.

LOWE’S HIW, INC. and DOES 1 to
20, inclusive,

Defendant.

CASE NO. 1:12-CV-01096-LJO-JLT

ORDER GRANTING STIPULATED
PROTECTIVE ORDER

(Doc. 11)

It appearing to the Court that the Plaintiff and Defendant are in agreement that Lowe’s HIW, Inc. (hereinafter “the Defendant”) possesses proprietary policies and procedures, as well as personnel files of present and former employees, that include confidential information that may be subject to discovery in the proceedings in this matter but which should not be made available to the public generally, this Court hereby orders that:

1. All documents produced or information disclosed and any other documents or records designated as “confidential” by the Defendant shall be revealed only to Plaintiff, counsel of record in this case, paralegals and secretarial employees under counsel’s direct supervision, and such persons as are employed by counsel to act as experts in this action. The information considered as “confidential” and disclosed only in accord with the terms of this paragraph shall include, without

1 limitation, all of the Defendant's policies and procedures, as well as personnel
2 records, including disciplinary records, identity, or any other information or
3 documentation supplied by the Defendant in response to Plaintiff's Interrogatories or
4 Requests for Production.

5 2. Counsel for Plaintiff shall use all documents and information produced
6 or disclosed by the Defendant solely for the purposes of preparation for and trial of
7 this action. Under no circumstances shall information or materials covered by this
8 Protective Order be disclosed to anyone other than Plaintiff's counsel of record in
9 this action, paralegals, secretarial employees under counsel's direct supervision, and
10 such persons employed to act as experts in this action. At the conclusion of the
11 proceedings in this action, all documents and information subject to this Order,
12 including any copies or extracts or summaries thereof, or documents containing
13 information taken therefrom, shall be returned to counsel for the Defendant.

14 3. Prior to disclosure of any documents designated as "confidential" to
15 paralegals or secretarial employees of counsel or Plaintiff, counsel for Plaintiff shall
16 require such employees to read this Protective Order and agree to be bound by its
17 terms.

18 4. If counsel for Plaintiff determines that for purposes of this action,
19 documents or information produced by the Defendant and designated as
20 "confidential" must be revealed to a person employed to act as an expert in this
21 action, then counsel may reveal the designated documents or information to such
22 person, after first complying with the following:

23 (a) Counsel for the Plaintiff shall have the expert read this Order and shall
24 explain the contents thereof to such expert.

25 (b) Counsel for the Plaintiff shall require such expert to sign a copy of this
26 protective order that states: "I have read and understood the terms of
27 this protective order. I further agree to be bound by its terms." Nothing
28 in this paragraph shall be deemed to enlarge the right of Defendant to

