

1 David J. Duchrow, Bar No. 105617
Jill A. Piano, Bar No. 193980
2 DUCHROW & PIANO, LLP
2510 Main Street, Suite 205
3 Santa Monica, California 90405
4 Telephone: (310) 452-4900
Facsimile: (310) 452-4901
5 Emails: djduchrow@yahoo.com, jillatduchrowlaw@gmail.com

6 María G. Díaz, SBN 220087
Kirby Fernando Cañon, SBN 276414
7 **THE DIAZ LAW FIRM**
8 7045 N. Maple Ave., Suite 107
Fresno, California 93720
9 Telephone: (559) 321-8880
Facsimile: (559) 321-8878
10 Emails: Maria@mdiazlaw.com, kirbv@mdiazlaw.com

11 Attorneys for **PLAINTIFF, CLYDE TILLERY**

12 Jesse J. Maddox, Bar No. 219091
jmaddox@lcwlegal.com
13 Kimberly A. Horiuchi, Bar No. 214869
khoriuchi@lcwlegal.com
14 **LIBERT CASSIDY WHITMORE**
15 A Professional Law Corporation
5250 North Palm Ave., Suite 310
16 Fresno, California 93704
17 Telephone: 559.256.7800
Facsimile: 559.449.4535

18 Attorneys for **DEFENDANTS, JOHN D. LOLLIS, CITY OF PORTERVILLE, CITY**
19 **OF PORTERVILLE FIRE DEPARTMENT, MARIO GARCIA and GLENN IRISH**

20 UNITED STATES DISTRICT COURT
21 EASTERN DISTRICT OF CALIFORNIA

22 **CLYDE TILLERY,**
23 Plaintiff,
24 v.
25 **JOHN D. LOLLIS; MARIO GARCIA;**
26 **CITY OF PORTERVILLE; GLEN**
27 **IRISH; CITY OF PORTERVILLE**
FIRE DEPARTMENT; and DOES 1
28 **through 20,** inclusive,
Defendants.

CASE No. 1:14-cv-02025-KJM-BAM
STIPULATION FOR PROTECTIVE
ORDER RE: CONFIDENTIALITY OF
DISCOVERY MATERIALS
Judge: Kimberly J. Mueller, United States,
District Court Judge, Sacramento, CA
Second Amended Complaint Filed:
September 2, 2015
Trial Date: February 13, 2017

1 Having considered the stipulated protective order filed on November 16, 2015, in
2 this action, *Clyde Tillery v. City of Porterville, et al.*, U.S. District Court for the Eastern
3 District, Case No. 1:14-cv-02205-KJM-BAM, the Court adopts the protective order in its
4 entirety subject to the following limitation pursuant to Local Rule 141:

5 All parties shall comply with the requirements of Eastern District Local Rule 141 in
6 the event that a party would like Confidential Material to be sealed in court filings. In lieu
7 of seeking a motion to seal, the parties may agree to redact the Confidential Material
8 contemplated by the stipulated protective order.

9 IT IS SO ORDERED.

10 Dated: November 19, 2015

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28