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

JANE DOE, an individual,
Plaintiff,
vs.
COUNTY OF KERN, GEORGE ANDERSON,
and DOES 1-10,
Defendants.

Case No. 1:16-cv-01469-JLT
JOINT STIPULATION AND ORDER
REGARDING SUBMISSIONS
CONTAINING ALLEGEDLY
CONFIDENTIAL INFORMATION

STIPULATION

The parties to this action jointly, through their respective attorneys of record, stipulate as follows:

1. Two motions for summary judgment are currently scheduled for hearing on December 7, 2017 (Doc. No. 60). The deadline for Plaintiff to file her opposition memoranda and supporting materials is approaching.
2. In the course of preparing her oppositions, Plaintiff’s attorneys have conferred with counsel for the other parties. The issue is the contemplated citation in Plaintiff’s submissions of materials that Defendants have designated as confidential in the course of discovery.
3. Defendants contend that certain categories of information discovered in this matter should remain confidential, including, without limitation, anything related to Defendant

1 Anderson's personnel file, the documents and information from the Internal Affairs investigation
2 of this incident, and Defendant Anderson's current employment status. Plaintiff believes that these
3 categories are broad enough to capture information that she intends to use in opposing these
4 motions.

5 4. Plaintiff's concern is that she be able to timely submit all of the materials she
6 wishes to submit for the Court's consideration. Since she is responding to two motions
7 simultaneously; since her oppositions are coming due over the Thanksgiving holiday; and since
8 this is a case of significant complexity and detail involving at least 19 depositions and two
9 overlapping prior investigations, she believes she should be able to make full use of the time
10 period for preparing her oppositions.

11 5. After conferring by email, the parties have agreed to the following proposal, which
12 mirrors the solution adopted by the Court in a parallel case involving Defendant Anderson.

13 5. The parties propose that Plaintiff have leave to file her entire oppositions, including
14 all supporting documents, under seal. From the date of that submission, the parties will have 14
15 days to meet and confer on a redacted version to be entered in the public record. If the parties fail
16 to agree on a redacted version, they will each submit their separate proposals for redactions along
17 with a brief statement outlining their differences to chambers for review.

18 6. The parties submit that there is good cause for approving this proposal because it
19 provides all parties with adequate protection and avoids prejudice to either side. This proposal
20 gives Plaintiff the full use of the time period for opposing the motions, and protects her right to
21 submit all of the materials she wishes in opposition to these important motions. Meanwhile, it also
22 gives Defendants the security of knowing that nothing that they allege is confidential will be
23 entered into the public docket without them first having an opportunity to propose redactions.

24 7. The parties request that the Court issue an order implementing this proposal. The
25 parties are also available for an informal conference if any additional information, argument, or
26 clarification is required.

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ORDER

Based upon the foregoing stipulation of the parties, the Court **ORDERS**:

Plaintiff is granted leave to submit her entire oppositions to the above motions, including all supporting documents, under seal. From the date of that submission, the parties will have 14 days to meet and confer on and submit to chambers a jointly agreed upon redacted version to be entered in the public record. If the parties fail to agree on a redacted version, they will each submit their separate proposals for redactions along with a brief statement outlining their differences to chambers for review.

IT IS SO ORDERED.

Dated: November 20, 2017

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE