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

CHRISTOPHER WARD and LINDA
QUINTEROS, on behalf of themselves and
others similarly situated,

Plaintiffs,

vs.

GOLDEN STATE FC, LLC, a Delaware
limited liability company; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 1:17-cv-01300-DAD-MJS

CLASS ACTION

**STIPULATED FEDERAL RULE OF
EVIDENCE 502(d) ORDER**

Complaint Filed: August 1, 2017
Removed: September 28, 2017
First Amended Complaint: January 19, 2018

1 Plaintiffs CHRISTOPHER WARD and LINDA QUINTEROS (“Plaintiffs”) on behalf of
2 themselves and all other similarly situated employees of Defendant GOLDEN STATE FC, LLC
3 (“Defendant”) (collectively, “the Parties”), and Defendant, by and through their respective
4 undersigned counsel of record, in order to allow the Parties to respond to discovery expeditiously
5 while limiting discovery costs, hereby stipulate for an order pursuant to Federal Rule of Evidence
6 502(d) that states:

7 Pursuant to Federal Rule of Evidence 502(d), neither the attorney-client privilege nor the
8 work product protection is waived by disclosure of such information in this litigation. The
9 production of privileged or work product protected documents, whether in electronically stored
10 information or other materials, is not a waiver of the privilege or protection in this case or in any
11 other federal or state proceeding. If any privileged or work product protected documents are
12 produced, the party receiving produced documents (“Receiving Party”) shall, at the request of the
13 party producing those documents (“Producing Party”), promptly return such documents (and all
14 copies thereof), including all later created excerpts, summaries, compilations, and other documents
15 or records that include, communicate, or reveal the information claimed to be privileged or
16 protected. A Receiving Party who receives a document that it knows or reasonably should know
17 is privileged shall notify the Producing Party within 3 business days of discovery of the
18 document.

19 Nothing in this Order overrides any attorney’s ethical responsibilities to refrain from
20 examining or disclosing materials that the attorney knows or reasonably should know to be
21 privileged and to inform the Producing Party that such materials have been produced.

22 Nothing in this Order is intended to or shall serve to limit a party’s right to conduct a
23 review of documents, ESI or information (including metadata) for relevance, responsiveness
24 and/or segregation of privileged and/or protected information before production.

25 The provisions of Federal Rule of Evidence 502(b)(2) are inapplicable to the production of
26 protected information under this Order.

27 This Order shall be interpreted to provide the maximum protection allowed by Federal
28 Rule of Evidence 502(d).

1 The obligations imposed by this Rule 502(d) Order shall survive the termination of this
2 action.
3 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

4 DATED: March 7, 2018

DAVID YEREMIAN & ASSOCIATES, INC.

5
6 By /s/ Alvin B. Lindsay
7 David Yeremian
8 Alvin B. Lindsay
9 Attorneys for Plaintiffs
CHRISTOPHER WARD and
LINDA QUINTEROS and the putative class

10 DATED: March 7, 2018

MORGAN, LEWIS & BOCKIUS, LLP

11
12 By /s/ Joel M. Purles
13 Barbara J. Miller
14 Roberta H. Kuehne
15 Joel M. Purles
16 Attorneys for Defendant GOLDEN STATE FC, LLC

17 I attest that Alvin B. Lindsay has concurred in the filing of this document.

18
19 Dated: March 7, 2018

/s/ Joel M. Purles
Joel M. Purles

20
21 **PURSUANT TO STIPULATION,**

22
23 IT IS SO ORDERED.

24
25 Dated: March 8, 2018

/s/ Michael J. Seng
UNITED STATES MAGISTRATE JUDGE

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