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7 Attorneys for Defendant
NEXSTAR BROADCASTING, INC.,
8

9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA
11

12 PAULA GORDON, an individual,
13

14 Plaintiff,

15 v.

16 NEXSTAR BROADCASTING, INC.
a business entity, form unknown; KGET-TV
17 17, a business entity, form unknown; The CW
NETWORK, LLC, a business entity, form
unknown; TELEMUNDO 17.3, a business
18 entity, form unknown; ERIK MENDOZA, an
individual; and DOES 1 through 100, inclusive
19

20 Defendants.

Case No. 1:18-cv-00007-DAD-JLT

**ORDER GRANTING STIPULATION
REGARDING FEDERAL RULES OF
EVIDENCE RULE 502(d)**

(Doc. 57)

21
22 The Parties hereby enter into the following stipulation regarding the production of
23 privileged or work-product protected documents, electronically stored information (“ESI”) or
24 other information as follows:

25 1. Plaintiff and Defendants stipulate, through their counsel of record, that the
26 production of privileged or work-product protected documents, electronically stored information
27 (“ESI”) or other information, whether inadvertent or otherwise, is not a waiver of the privilege or
28 protection from discovery in this case or in any other federal or state proceeding. This Order shall

1 be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

2 2. Nothing contained herein is intended to or shall serve to limit a party's right to
3 conduct a review of documents, ESI or information (including metadata) for relevance,
4 responsiveness and/or segregation of privileged and/or protected information before production.

5 IT IS SO STIPULATED:

6 Dated: April 2, 2018

JACKSON LEWIS P.C.

7
8
9 By: /s/ Stephanie T. Yang
10 Dylan B. Carp
11 Angel R. Sevilla
12 Stephanie T. Yang
Attorneys for Defendant
NEXSTAR BROADCASTING,
INC.

13 Dated: April 2, 2018

LAW OFFICES OF VICTOR L. GEORGE

14
15 By: /s/ Wayne C. Smith
16 (as authorized on 04/02/18)
17 Victor L. George
18 Wayne C. Smith
Attorneys for Plaintiff
PAULA GORDON

19 Dated: April 2, 2018

FISHER & PHILLIPS LLP

20
21 By: /s/ Cheryl L. Schreck
22 (as authorized on 04/02/18)
23 Todd B. Scherwin
24 Cheryl L. Schreck
Attorneys for Defendant
ERIK MENDOZA

25 IT IS SO ORDERED.

26 Dated: April 2, 2018

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE