

1 DAVID J. WEILAND #160447  
*dweiland@ch-law.com*  
2 KEITH M. WHITE #188536  
*kwhite@ch-law.com*  
3 COLEMAN & HOROWITT, LLP  
Attorneys at Law  
4 499 West Shaw, Suite 116  
Fresno, California 93704  
5 Telephone: (559) 248-4820  
Facsimile: (559) 248-4830  
6

Attorneys for Defendants  
7 CENTRAL VALLEY COMMUNITY  
SPORTS FOUNDATION, a non-profit  
8 corporation, dba GATEWAY ICE CENTER; and  
JEFF BLAIR  
9

10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF CALIFORNIA  
12

13  
14 MEGAN MCKEON; LAILA NEAL, A  
MINOR BY AND THROUGH HER  
15 GUARDIAN AD LITEM, TINA NEAL; and  
TINA NEAL,

16 Plaintiffs,

17 v.

18 CENTRAL VALLEY COMMUNITY  
SPORTS FOUNDATION, a Non-Profit  
19 Corporation, dba GATEWAY ICE CENTER;  
and JEFF BLAIR, an individual; and DOES 1  
20 through 50, Inclusive,

21 Defendants.

Case No. 1:18-CV-00358-DAD-BAM

**STIPULATED PROTECTIVE ORDER  
RE: USE OF VIDEO RECORDED  
DEPOSITIONS**

22  
23 Defendants CENTRAL VALLEY COMMUNITY SPORT FOUNDATATION, a Non-  
24 Profit Corporation, dba GATEWAY ICE CENTER (“CVCSF”) and JEFF BLAIR (“Blair”)  
25 (CVCSF and Blair are collectively “Defendants”) and Plaintiffs, MEGAN MCKEON, LAILA  
26 NEAL by and through her Guardian Ad Litem, Tina Neal, and TINA NEAL (“collectively  
27 “Plaintiffs”) by and through their counsel of record, hereby agree and stipulate that the Court enter  
28 an order prohibiting the use and distribution of any video recording of depositions taken in this

1 matter in any manner outside of the direct litigation without prior approval of the Court. If either  
2 party wants to use any video recording of depositions for any purpose outside of this litigation,  
3 they shall file a motion with the Court requesting prior approval for such a use. Counsel for the  
4 parties shall retain control of any such video recordings of depositions to prevent unapproved use  
5 or distribution.

6 Dated: May 16, 2019

COLEMAN & HOROWITT, LLP

7

8

By: /s/ Keith M. White  
KEITH M. WHITE  
Attorneys for Defendants, CENTRAL  
VALLEY COMMUNITY  
SPORTS FOUNDATION, a Non-Profit  
Corporation, dba GATEWAY ICE  
CENTER; and  
JEFF BLAIR

9

10

11

12

13

14 Dated: May 16, 2019

HATMAKER LAW GROUP

15

16

By /s/ Rachelle Taylor Golden  
RACHELLE TAYLOR GOLDEN  
Attorney for Plaintiffs, MEGAN  
MCKEON, TINA NEAL and  
LAILA NEAL

17

18

19

20

21

22

23

24

25

26

27

28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

Pursuant to the stipulation of the parties through their counsel of record, IT IS HEREBY ORDERED that:

The use and distribution of any video recording of depositions taken in this matter in any manner outside of the direct litigation without prior approval of the Court is PROHIBITED. If either party wants to use any video recording of depositions for any purpose outside of this litigation, they shall file a motion with the Court requesting prior approval for such a use. Counsel for the parties shall retain control of any such video recordings of depositions to prevent unapproved use or distribution.

IT IS SO ORDERED.

Dated: May 17, 2019

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE