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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

**CHRISTINA GONZALEZ, ANJELICA GONZALEZ, and VICTORIA GONZALEZ, individually and as successors in interest to JASON GONZALEZ, deceased,**  
  
Plaintiffs,  
  
v.  
  
**STATE OF CALIFORNIA; and DOE CHP OFFICERS 1 - 15, inclusive,**  
  
Defendants.

Case No. 1:20-cv-00912-NONE-JLT

**STIPULATION AND PROPOSED ORDER MODIFYING PROTECTIVE ORDER**  
(Doc. 13)

WHEREAS, a protective order was entered in this case on September 1, 2020 (Dkt. No. 11);

WHEREAS, Defendant State of California subpoenaed records from the Kern County Sheriff – Coroner’s Office;

WHEREAS, the records to be produced in response to the subpoena by the Kern County Sheriff – Coroner’s Office include autopsy photographs, which are prohibited from dissemination pursuant to California Code of Civil Procedure section 129;

//

1 NOW, THEREFORE, the parties stipulate that the protective order entered on September  
2 1, 2020 (Dkt. No. 11) shall include autopsy photos in its definition of “Confidential Information”  
3 and that any autopsy photographs produced by the Kern County Sheriff – Coroner’s Office shall  
4 be subject to the protective order entered on September 1, 2020 (Dkt. No. 11).

5  
6 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

7  
8 Dated: October 14, 2020

LAW OFFICES OF YORK AND GARVEY

9 By: s/ Darrell J. York  
10 DARRELL J. YORK  
11 SARAH L. GARVEY  
Attorneys for Plaintiffs

12 Dated: October 14, 2020

XAVIER BECERRA  
Attorney General of California  
MARK T. CUMBA  
Supervising Deputy Attorney General

15 As the filer of this stipulation, I attest that all other  
16 signatories listed, and on whose behalf the filing is  
submitted, concur in the filing’s content and have  
authorized the filing.

17 By: s/ Donna M. Dean  
18 DONNA M. DEAN  
19 Deputy Attorney General  
Attorneys for Defendant  
State of California

20  
21 FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

22  
23 Dated: October 16, 2020

  
24 Jennifer L. Thurston  
25 United States Magistrate Judge