1 2 3 4 5 6 7	TODD M. NOONAN (SBN 172962) JOHN WHITTAKER (SBN 251791) ASHLEY H. JOYCE (SBN 272549) MEGAN A. SAMMUT (SBN 287772) <b>DLA PIPER LLP (US)</b> 400 Capitol Mall, Suite 2400 Sacramento, CA 95814 Telephone: 916.930-3200 Facsimile: 916.930-3201 john.whittaker@dlapiper.com Attorneys for Plaintiff RENO FUENTES RIOS	
8		
9	UNITED STATES DISTRICT COURT	
10	EASTERN DISTRICT OF CALIFORNIA	
11		
12	RENO FUENTES RIOS,	CASE NO. 2:07-cv-00790 KJN P
13	Plaintiff,	[ <del>PROPOSED</del> ] STIPULATED PROTECTIVE ORDER
14	V.	
15	J.E. TILTON, et al.,	
16	Defendants.	
17		
18	Subject to the approval of the Court, and pursuant to the Court's September 3, 2014	
19	Pretrial Order providing that the parties submit a stipulated protective order to provide for the	
20	submission of certain confidential source information to the Court <i>in camera</i> and to Plaintiff's	
21	counsel, the undersigned parties through their counsel of record stipulate that the provisions of	
22	<ol> <li>this Protective Order shall apply to the confidential materials described below.</li> <li>This Order covers the following materials:</li> </ol>	
23		ource items and all supporting confidential
24 25		
25 26	information upon which CDCR employees relied in validating Plaintiff as a prison gang associate, which have been ordered to be submitted to the Court <i>in camera</i> , and which have not	
20	been previously produced to Plaintiff;	
27		
DLA PIPER LLP (US) Sacramento	WEST\249992534.3 [PROPOSED] STI	-1- PULATED PROTECTIVE ORDER; NO. 2:07-CV-00790 KJN

1	(b) All declaration(s) that might be submitted by Defendants in connection	
2	with the <i>in camera</i> review specified in item (a);	
3	(c) All deposition testimony or oral argument regarding items (a) or (b);	
4	(d) All motions, exhibits and attachments thereto, and hearings regarding items	
5	(a) or (b), including, but not limited to, any <i>in camera</i> review of items (a) or (b) and any briefing	
6	submitted by either party in connection with any in camera review of items (a) or (b); and	
7	(e) All court testimony regarding items (a) or (b).	
8	Defendants assert that these materials have been deemed confidential by the California	
9	Department of Corrections ("CDCR") for safety and security reasons and have been restricted	
10	from general distribution, including, but not limited to, inmates, parolees, and the public.	
11	2. All documents and information falling within one or more of the categories	
12	enumerated in Paragraph 1 shall be designated as "Confidential Attorneys Eyes Only" and	
13	subject to this Protective Order. Such material is referred to herein as "Confidential Material."	
14	All documents containing Confidential Material shall be marked "Confidential – Attorneys' Eyes	
15	Only" on each page, and marked in such a fashion so as not to obscure any of the underlying	
16	content of the document(s). Any failure to mark appropriate documents containing Confidential	
17	Material as "Confidential – Attorneys' Eyes Only" shall not operate as a waiver of the protections	
18	provided under this Protective Order. In such event, after the failure is discovered, the party	
19	discovering the failure shall promptly notify the other party of such failure, and the producing	
20	party shall take all necessary steps to ensure that the Confidential Material is correctly marked as	
21	"Confidential – Attorneys' Eyes Only."	
22	3. Confidential Material may be disclosed only to the following persons:	
23	(a) The Court, and court personnel and court reporters employed by the Court	
24	who are involved in proceedings in this action;	
25	(b) Counsel for Plaintiff;	
26	(c) Paralegal, clerical, and secretarial personnel regularly employed by counsel	
27	for Plaintiff and designated by counsel for Plaintiff to review or handle such materials; and	
28	-2-	
DLA PIPER LLP (US) Sacramento	WEST\249992534.3 [PROPOSED] STIPULATED PROTECTIVE ORDER; NO. 2:07-CV-00790 KJN	

1 2

agree.

- (d) Any other person as to whom Plaintiff's counsel and Defendants in writing
- 4. This Stipulated Protective Order is intended to, and does preclude, counsel for
   Plaintiff and the individuals mentioned in Paragraph 3, subsections (a)-(d) from disclosing
   Confidential Material to Plaintiff, members of Plaintiff's family, friends or associates of Plaintiff,
   any inmate or parolee, or to the public.
- 7 5. Each person listed in Paragraph 3 subsections (c) and (d) to whom disclosure of 8 Confidential Material is made shall, prior to the time of disclosure, be provided with a copy of the 9 Stipulated Protective Order and execute a non-disclosure agreement. (See attached Non-10 Disclosure Agreement ("NDA")). As provided in the NDA, such persons must consent to be 11 subject to the jurisdiction of the United States District Court for the Eastern District of California 12 with respect to any proceeding relating to the enforcement of this Stipulated Protective Order. 13 They must additionally agree to maintain Confidential Material, including copies, notes, or other 14 transcriptions made from the Confidential Material, in a secure manner to prevent unauthorized 15 access. Finally, they must agree to return the Confidential Material, including copies, notes, or 16 other transcriptions made from the materials, to counsel for Plaintiff within thirty days after 17 conclusion of this action. Executed non-disclosure agreements shall be retained by counsel for 18 Plaintiff and made available for inspection by Defendants' counsel upon order of the Court.
- If counsel for Plaintiff wishes to disclose Confidential Material to any person not
   enumerated above in Paragraph 3, subsections (a)–(d), including, but not limited to Plaintiff,
   counsel for Plaintiff must first submit a separate application for limited disclosure to the Court
   under seal, and serve same to Defendants' counsel. The disclosure of Confidential Material to
   any person not enumerated in Paragraph 3 subsections (a)–(d), shall be withheld unless and until
   ordered by the Court upon a finding of good cause.
- 7. No person who has been afforded access to Confidential Material under this
  Protective Order shall disclose or discuss the Confidential Material except as is necessary for the
  prosecution, defense, or settlement of this litigation, and then only in accordance with Paragraph
  3 of this Order.

8. If counsel for Plaintiff seeks to depose, interview, or otherwise contact any
 confidential informant or other inmate or parolee whose name appears on any Confidential
 Material, and whom Plaintiff's counsel first discovered through such Confidential Material, then
 Plaintiff's counsel must secure the written agreement of Defendants' counsel or further order
 from the Court.

9. Counsel for Plaintiff and persons listed in Paragraph 3, subsection (c), shall not
make copies of the Confidential Material obtained by them, except as is necessary for the purpose
of this litigation. Counsel for Plaintiff will maintain control over all Confidential Material and
copies obtained by them.

10 10. Unless counsel otherwise agreed in writing, when Confidential Material is
 included in any papers to be filed in Court, the party seeking to file such papers shall file a
 Motion to File Under Seal in accordance with and to the extent allowable by the Eastern District
 of California Local Rules, and lodge such papers with the Clerk as required under the Eastern
 District of California Local Rules.

15 11. All Confidential Material obtained by counsel for Plaintiff shall be used solely in
16 connection with this litigation and not for any other purpose.

17 12. No later than thirty days after the conclusion of the trial and any appeal, or upon
other termination of this litigation, all originals of items (a) and (b) of Paragraph 1 obtained by
counsel for Plaintiff shall be either destroyed or returned to counsel for Defendants, at the
direction of Defendants' counsel. All other Confidential Materials in the possession of counsel
for Plaintiff shall be destroyed.

13. The limitations on access to Confidential Material contained in the foregoing
provisions of this order do not apply to Defendants, their counsel, employees, or representatives.
Nothing in the protective order is intended to prevent officials or employees of the State of
California or authorized governmental officials from having ordinary and usual access to
Confidential Material to which they could have access in the normal course of their official
duties. Neither the filing with the Court of motions, exhibits, or attachments containing personal
or otherwise confidential information about any individual Defendant nor the service on

1       Defendants' counsel of such motions, exhibits, or attachments, shall be deemed to constitute         2       disclosing Confidential Material to any individual Defendant in violation of the terms of this         3       stipulated protective order.         4       14. The provisions of this protective order are without prejudice to the right of any         5       party to apply to the Court for a further protective order relating to any Confidential Material in         6       the litigation, or to apply to the Court for a modification of this order or for any order permitting         7       disclosure of Confidential Material beyond the terms of this order.         8       15. The provisions of this order shall remain in force and effect until further order of         9       this Court.       16. Should Plaintiff's counsel, or any individual mentioned in Paragraph 3 of this         10       order, fail to comply with any provisions of this Protective Order, the Court may, in its         11       discretion, impose sanctions on the appropriate party including, but not limited to, those         13       applicable as listed in Federal Rule of Civil Procedure 37(b)(2).         14       By: <u>/s/ John S. Whittaker</u> 19       Dated: September 10, 2014       By: <u>/s/ David A. Carrasco (authorized on 9/10/14)</u> 12       Dated: September 10, 2014       By: <u>/s/ David A. Carrasco (authorized on 9/10/14)</u> <			
3       stipulated protective order.         4       14. The provisions of this protective order are without prejudice to the right of any party to apply to the Court for a further protective order relating to any Confidential Material in the litigation, or to apply to the Court for a modification of this order or for any order permitting disclosure of Confidential Material beyond the terms of this order.         7       15. The provisions of this order shall remain in force and effect until further order of this Court.         10       16. Should Plaintiff's counsel, or any individual mentioned in Paragraph 3 of this         11       Order, fail to comply with any provisions of this Protective Order, the Court may, in its discretion, impose sanctions on the appropriate party including, but not limited to, those applicable as listed in Federal Rule of Civil Procedure 37(b)(2).         14       By:       /s/ John S. Whittaker         19       Dated: September 10, 2014       DLA PIPER LLP (US)         11       Dated: September 10, 2014       By:       /s/ John S. Whittaker         10       Dated: September 10, 2014       By:       /s/ John S. WHITTAKER         10       Dated: September 10, 2014       By:       /s/ John S. Whittaker         12       Dated: September 10, 2014       By:       /s/ John S. Whittaker         13       Dated: September 10, 2014       By:       /s/ John S. WHITTAKER         14       Dated: September 10, 2014       By:	1	Defendants' counsel of such motions, exhibits, or attachments, shall be deemed to constitute	
4       14. The provisions of this protective order are without prejudice to the right of any party to apply to the Court for a further protective order relating to any Confidential Material in the litigation, or to apply to the Court for a modification of this order or for any order permitting disclosure of Confidential Material beyond the terms of this order.         7       the litigation, or to apply to the Court for a modification of this order or for any order permitting disclosure of Confidential Material beyond the terms of this order.         8       15. The provisions of this order shall remain in force and effect until further order of this Court.         10       16. Should Plaintiff's counsel, or any individual mentioned in Paragraph 3 of this         11       Order, fail to comply with any provisions of this Protective Order, the Court may, in its discretion, impose sanctions on the appropriate party including, but not limited to, those applicable as listed in Federal Rule of Civil Procedure 37(b)(2).         14       5       SO STIPULATED.         16       Dated: September 10, 2014       DLA PIPER LLP (US)         17       By:       // John S, Whittaker JOHN S, WHITTAKER Attorneys for Plaintiff         19       Dated: September 10, 2014       By:       // David A. Carrasco (authorized on 9/10/14) DAVID A. CARASCO Depuy Atorney General Attorney for Defendants         21       Dated: September 15, 2014       Harder Har	2	disclosing Confidential Material to any individual Defendant in violation of the terms of this	
party to apply to the Court for a further protective order relating to any Confidential Material in the litigation, or to apply to the Court for a modification of this order or for any order permitting disclosure of Confidential Material beyond the terms of this order.         1       15. The provisions of this order shall remain in force and effect until further order of this Court.         10       16. Should Plaintiff's counsel, or any individual mentioned in Paragraph 3 of this         10       16. Should Plaintiff's counsel, or any individual mentioned in Paragraph 3 of this         11       Order, fail to comply with any provisions of this Protective Order, the Court may, in its         12       discretion, impose sanctions on the appropriate party including, but not limited to, those         13       applicable as listed in Federal Rule of Civil Procedure 37(b)(2).         14       15         15       SO STIPULATED.         16       Dated: September 10, 2014       DLA PIPER LLP (US)         17       By:       _/s/ John S. Whittaker         19       Dated: September 10, 2014       By:       _/s/ David A. Carrasco (authorized on 9/10/14)         12       Dated: September 10, 2014       By:       _/s/ David A. Carrasco (authorized on 9/10/14)         12       Dated: September 10, 2014       By:       _/s/ David A. Carrasco (authorized on 9/10/14)         13       Dated: September 15, 2014	3	stipulated protective order.	
6       the litigation, or to apply to the Court for a modification of this order or for any order permitting disclosure of Confidential Material beyond the terms of this order.         7       15. The provisions of this order shall remain in force and effect until further order of this Court.         10       16. Should Plaintiff's counsel, or any individual mentioned in Paragraph 3 of this         11       Order, fail to comply with any provisions of this Protective Order, the Court may, in its         12       discretion, impose sanctions on the appropriate party including, but not limited to, those         13       applicable as listed in Federal Rule of Civil Procedure 37(b)(2).         14       5         15       SO STIPULATED.         16       Dated: September 10, 2014       DLA PIPER LLP (US)         17       By:/s/ John S. Whittaker	4	14. The provisions of this protective order are without prejudice to the right of any	
7       disclosure of Confidential Material beyond the terms of this order.         8       15. The provisions of this order shall remain in force and effect until further order of this Court.         10       16. Should Plaintiff's counsel, or any individual mentioned in Paragraph 3 of this         11       Order, fail to comply with any provisions of this Protective Order, the Court may, in its         12       discretion, impose sanctions on the appropriate party including, but not limited to, those         13       applicable as listed in Federal Rule of Civil Procedure 37(b)(2).         14       15         15       SO STIPULATED.         16       Dated: September 10, 2014       DLA PIPER LLP (US)         17       By: /s/ John S. Whittaker         19       JOHN S. WHITTAKER         19       Dated: September 10, 2014       By: /s/ David A. Carrasco (authorized on 9/10/14)         12       Dated: September 10, 2014       By: /s/ David A. Carrasco (authorized on 9/10/14)         12       Dated: September 10, 2014       By: /s/ David A. Carrasco (authorized on 9/10/14)         13       Dated: September 10, 2014       By: /s/ David A. Carrasco (authorized on 9/10/14)         13       Dated: September 15, 2014       Harrison Autorety General Attorney General Attorney General Attorney for Defendants         14       APPROVED AND SO ORDERED.       Dated: September	5	party to apply to the Court for a further protective order relating to any Confidential Material in	
8       15. The provisions of this order shall remain in force and effect until further order of this Court.         10       16. Should Plaintiff's counsel, or any individual mentioned in Paragraph 3 of this         11       Order, fail to comply with any provisions of this Protective Order, the Court may, in its         12       discretion, impose sanctions on the appropriate party including, but not limited to, those         13       applicable as listed in Federal Rule of Civil Procedure 37(b)(2).         14       15         15       SO STIPULATED.         16       Dated: September 10, 2014       DLA PIPER LLP (US)         17       18         18	6	the litigation, or to apply to the Court for a modification of this order or for any order permitting	
<ul> <li>this Court.</li> <li>16. Should Plaintiff's counsel, or any individual mentioned in Paragraph 3 of this</li> <li>Order, fail to comply with any provisions of this Protective Order, the Court may, in its</li> <li>discretion, impose sanctions on the appropriate party including, but not limited to, those</li> <li>applicable as listed in Federal Rule of Civil Procedure 37(b)(2).</li> <li>SO STIPULATED.</li> <li>Dated: September 10, 2014 DLA PIPER LLP (US)</li> <li>By: /s/ John S. Whittaker</li> <li>JOHN S. WHITTAKER</li> <li>Dated: September 10, 2014 By: /s/ David A. Carrasco (authorized on 9/10/14)</li> <li>DAted: September 10, 2014 By: /s/ David A. Carrasco (authorized on 9/10/14)</li> <li>DAted: September 10, 2014 By: /s/ David A. Carrasco (authorized on 9/10/14)</li> <li>DAted: September 15, 2014 LT (S)</li> <li>APPROVED AND SO ORDERED.</li> <li>Dated: September 15, 2014 LT (S)</li> </ul>	7	disclosure of Confidential Material beyond the terms of this order.	
10       16. Should Plaintiff's counsel, or any individual mentioned in Paragraph 3 of this         11       Order, fail to comply with any provisions of this Protective Order, the Court may, in its         12       discretion, impose sanctions on the appropriate party including, but not limited to, those         13       applicable as listed in Federal Rule of Civil Procedure 37(b)(2).         14	8	15. The provisions of this order shall remain in force and effect until further order of	
11       Order, fail to comply with any provisions of this Protective Order, the Court may, in its         12       discretion, impose sanctions on the appropriate party including, but not limited to, those         13       applicable as listed in Federal Rule of Civil Procedure 37(b)(2).         14       15         15       SO STIPULATED.         16       Dated: September 10, 2014       DLA PIPER LLP (US)         17       18         18       By:       /s/ John S. Whittaker         19       Attorneys for Plaintiff         20       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         21       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         21       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         22       David A. Carrasco (authorized on 9/10/14)       DAVID A. CARRASCO         23       Deputy Attorney for Defendants         24       APPROVED AND SO ORDERED.       Dated: September 15, 2014         25       Hardle September 15, 2014       Hardle September 15, 2014         26       Image: September 15, 2014       Image: September 15, 2014         27       Image: September 15, 2014       Image: September 15, 2014	9	this Court.	
12       discretion, impose sanctions on the appropriate party including, but not limited to, those         13       applicable as listed in Federal Rule of Civil Procedure 37(b)(2).         14       15         15       SO STIPULATED.         16       Dated: September 10, 2014       DLA PIPER LLP (US)         17       18         18       By: /s/ John S. Whittaker         19       JOHN S. WHITTAKER         20       21         21       Dated: September 10, 2014       By: /s/ David A. Carrasco (authorized on 9/10/14)         22       Dated: September 10, 2014       By: /s/ David A. Carrasco (authorized on 9/10/14)         23       Dated: September 10, 2014       By: /s/ David A. Carrasco (authorized on 9/10/14)         24       Dated: September 10, 2014       By: /s/ David A. Carrasco (authorized on 9/10/14)         23       Dated: September 15, 2014       Harrie California Attorney General Attorney General Attorney for Defendants         25       Dated: September 15, 2014       Harrie Magistrate Judge         26       KENDALL J. NEWMAN       UNITED STATES MAGISTRATE JUDGE         27       Exprese LLP (US)       -5-	10	16. Should Plaintiff's counsel, or any individual mentioned in Paragraph 3 of this	
applicable as listed in Federal Rule of Civil Procedure 37(b)(2). applicable as listed in Federal Rule of Civil Procedure 37(b)(2). SO STIPULATED. Dated: September 10, 2014 DLA PIPER LLP (US) By: /s/ John S. Whittaker JOHN S. WHITTAKER Attorneys for Plaintiff Dated: September 10, 2014 By: /s/ David A. Carrasco (authorized on 9/10/14) Dated: September 10, 2014 By: /s/ David A. Carrasco (authorized on 9/10/14) DAVID A. CARRASCO Deputy Attorney General Attorney for Defendants APPROVED AND SO ORDERED. Dated: September 15, 2014 Carrasco (authorized on 9/10/14) Dated: September 15, 2014 Dated: September 15, 2014 Dated: September 15, 2014 Dated: September 15, 2014 Carrasco (authorized on 9/10/14) Dated: September 15, 2014 Dated: September 15, 2014	11	Order, fail to comply with any provisions of this Protective Order, the Court may, in its	
14         15       SO STIPULATED.         16       Dated: September 10, 2014       DLA PIPER LLP (US)         17       By:       /s/ John S. Whittaker         19       JOHN S. WHITTAKER         19       Attorneys for Plaintiff         20       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         21       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         22       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         23       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         24       APPROVED AND SO ORDERED.       Dated: September 15, 2014       Junted: September 15, 2014         25       Junted: September 15, 2014       Junted: September 15, 2014       Junted: September 15, 2014         25       Junted: September 15, 2014       Junted Stattes Magistrate Judge         28       DLA PIPER LLP (US)       -5-	12	discretion, impose sanctions on the appropriate party including, but not limited to, those	
15       SO STIPULATED.         16       Dated: September 10, 2014       DLA PIPER LLP (US)         17       By: /s/ John S. Whittaker         19       JOHN S. WHITTAKER         19       JOHN S. WHITTAKER         20       Attorneys for Plaintiff         21       Dated: September 10, 2014       By: /s/ David A. Carrasco (authorized on 9/10/14)         DAVID A. CARRASCO       Deputy Attorney General         21       Dated: September 10, 2014       By: /s/ David A. Carrasco (authorized on 9/10/14)         DAVID A. CARRASCO       Deputy Attorney General         24       APPROVED AND SO ORDERED.         25       Dated: September 15, 2014       Harris Magistrate JUDGE         26       KENDALL J. NEWMAN         27       Lated: September 15, 2014       Harris Magistrate JUDGE         28       Lated: September 15, 2014       Harris Magistrate JUDGE	13	applicable as listed in Federal Rule of Civil Procedure 37(b)(2).	
16       Dated: September 10, 2014       DLA PIPER LLP (US)         17       By:       /s/ John S. Whittaker         18       By:       /s/ John S. Whittaker         19       JOHN S. WHITTAKER         20       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         21       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         22       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         23       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         24       APPROVED AND SO ORDERED.       Deputy Attorney General Attorney General Attorney for Defendants         24       APPROVED AND SO ORDERED.       John S. WHITTAKER MAGISTRATE JUDGE         26       JOHN S. WHITTAKER MAGISTRATE JUDGE         27       John S. ORDERED.       John S. Carrasco (authorized on 9/10/14)         26       John S. ORDERED.       John S. ORDERED.         27       John S. September 15, 2014       John S. Magistrate Judge         28       John S. J	14		
17       18       By:       /s/ John S. Whittaker         19       JOHN S. WHITTAKER         19       Attorneys for Plaintiff         20       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         22       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         23       Dated: September 10, 2014       By:       /s/ David A. CARRASCO         24       APPROVED AND SO ORDERED.       Dated: September 15, 2014       Maximum         25       Dated: September 15, 2014       Maximum       KENDALL J. NEWMAN         27       Lated: September 15, 2014       Maximum       KENDALL J. NEWMAN         28	15	SO STIPULATED.	
18       By:       /s/ John S. Whittaker         19       JOHN S. WHITTAKER         19       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         20       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         22       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         23       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         24       DAVID A. CARRASCO       Deputy Attorney General         23       Office of the California Attorney General         24       APPROVED AND SO ORDERED.       Dated: September 15, 2014         25       Dated: September 15, 2014       March March         26       March March       KENDALL J. NEWMAN         27       UNITED STATES MAGISTRATE JUDGE         28	16	Dated: September 10, 2014 DLA PIPER LLP (US)	
19       JOHN S. WHITTAKER Attorneys for Plaintiff         20       21         21       Dated: September 10, 2014       By:       _/s/ David A. Carrasco (authorized on 9/10/14) DAVID A. CARRASCO Deputy Attorney General Office of the California Attorney General Attorney for Defendants         23       APPROVED AND SO ORDERED. Dated: September 15, 2014         25	17		
19       Attorneys for Plaintiff         20       20         21       Dated: September 10, 2014       By: /s/ David A. Carrasco (authorized on 9/10/14)         22       DAVID A. CARRASCO         23       Deputy Attorney General         23       Office of the California Attorney General         24       APPROVED AND SO ORDERED.         Dated: September 15, 2014       Justice September 15, 2014         26       Justice September 15, 2014         27       Justice September 15, 2014         28       LLA PIPER LLP (US)	18		
21       Dated: September 10, 2014       By:       /s/ David A. Carrasco (authorized on 9/10/14)         22       DAVID A. CARRASCO       Deputy Attorney General         23       Office of the California Attorney General         24       APPROVED AND SO ORDERED.         Dated: September 15, 2014       Junted: September 15, 2014         25       Junted: September 15, 2014         26       Junted: September 15, 2014         27       Junted: September 15, 2014         28       Junted: September 15, 2014	19		
22       DAVID A. CARRASCO         23       Deputy Attorney General         23       Office of the California Attorney General         24       APPROVED AND SO ORDERED.         Dated: September 15, 2014       Image: Comparison of the california Attorney General         26       Image: Comparison of the california Attorney General         27       Image: Comparison of the california Attorney General         28       Image: Comparison of the california Attorney General         28       Image: Comparison of the california Attorney General         28       Image: Comparison of the california Attorney General         29       Image: Comparison of the california Attorney General         29       Image: Comparison of the california Attorney General         20       Image: Comparison of the california Attorney General         21       Image: Comparison of the california Attorney General         22       Image: Comparison of the california Attorney General         23       Image: Comparison of the california Attorney General         24       Image: Comparison of the california Attorney General         25       Image: Comparison of the california Attorney General         28       Image: Comparison of the california Attorney General         28       Image: Comparison of the california Attorney General	20		
22       Deputy Attorney General         23       Office of the California Attorney General         24       APPROVED AND SO ORDERED.         25       Dated: September 15, 2014         26       Image: Comparison of the California Attorney General         27       Dated: September 15, 2014         28       Image: Comparison of the California Attorney General         29       Image: Comparison of the California Attorney General         21       Image: Comparison of the California Attorney General         22       Image: Comparison of the California Attorney General         28       Image: Comparison of the California Attorney General         28       Image: Comparison of the California Attorney General         29       Image: Comparison o	21		
Attorney for Defendants APPROVED AND SO ORDERED. Dated: September 15, 2014 KENDALL J. NEWMAN UNITED STATES MAGISTRATE JUDGE	22	Deputy Attorney General	
25       Dated: September 15, 2014         26       Image: Constraint of the second seco	23		
25 26 27 28 DLA PIPER LLP (US)	24		
27 KENDALL J. NEŴMAN UNITED STATES MAGISTRATE JUDGE 28	25		
28 DLA PIPER LLP (US)	26	KENDALL J. NEWMAN	
DLA PIPER LLP (US)	27	UNITED STATES MAGISTRATE JUDGE	
		5	
	. ,		

1	<u>NON – DISCLOSURE AGREEMENT</u>	
2	Rios v. Tilton, et al., Case No. 2:07-cv-00790	
3		
4	I,, hereby certify my understanding that (print name)	
5	(print name)	
6	Confidential Material is being provided to me pursuant to the terms and restrictions of the	
7	Protective Order dated, <i>Rios v. Tilton, et al.</i> , case number 2:07-cv-	
8	00790. I have been given a copy of the Protective Order and have read it. I agree to be bound by	
9	the Protective Order and will not reveal the Confidential Material to anyone, except as allowed by	
10	the Order. I will maintain all such Confidential Material that is provided to me, including copies,	
11	notes, or other transcriptions made from the materials, in a secure manner to prevent unauthorized	
12	access to it. No later than thirty days after the conclusion of this action, I will return the	
13	Confidential Material, including copies, notes, or other transcriptions made from the materials, to	
14	counsel for Plaintiff. I hereby consent to the jurisdiction of the United States District Court of the	
15	Eastern District of California for the purpose of enforcing the Protecting Order.	
16		
17	DATED: Signature	
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DLA PIPER LLP (US) Sacramento	-6- WEST\249992534.3 [PROPOSED] STIPULATED PROTECTIVE ORDER; NO. 2:07-CV-00790 KJN	