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11 Attorneys for Defendant I.C. SYSTEM, INC.

12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION
14

15 GEOFF EMMETT,

16 Plaintiff,

17 vs.

18 I.C. SYSTEM, INC.,

19 Defendant. _____ /

CASE NO. **2:08-cv-02543-GEB-GGH**

**STIPULATION AND PROTECTIVE
ORDER RE: CONFIDENTIALITY OF
INFORMATION, DOCUMENTS AND
OTHER MATERIALS AND THINGS**

Complaint Filed: October 24, 2008
Trial Date: February 23, 2010

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22 **IT IS HEREBY STIPULATED AND AGREED** by and between Plaintiff GEOFF
23 EMMETT (“Plaintiff”) and Defendant I.C. SYSTEM, INC. (“Defendant”), by and through their
24 respective attorneys of record, as follows:

25 **RECITALS**

26 A. Plaintiff commenced this action by the filing of a complaint against Defendant on
27 October 24, 2008, in the United States District Court, Central District of California;

1 e. The Court and its personnel under seal, subject to the provisions of this
2 order.

3 f. Court reporters engaged to transcribe the proceedings or discovery in this
4 case.

5 Each person - excepting the Court and its personnel - who receives material subject to the
6 protections of this order shall be given a copy of this order prior to receiving the materials and
7 execute a copy of the acknowledgment attached Exhibit A to this order. No person apart from
8 counsel for the parties to this matter may be provided with any material designated as
9 “CONFIDENTIAL” unless that person is designated above and has executed that
10 acknowledgment.

11 3. Objections to the Designation of Confidentiality. Any party receiving
12 information designated as confidential may object to that designation at any time. A party who
13 objects to the designation shall serve objections to the designation and request in writing a
14 conference to resolve the conflict. The party challenging the designation is responsible for
15 making good faith efforts to arrange that conference. If the parties cannot resolve the objections
16 to the designation, the party challenging the designation of confidentiality shall move to have the
17 information exempted from this Order.

18 4. Use of Confidential Materials in Dispositive Motions and At Trial. No
19 *information designated as confidential* shall be submitted to or filed with the Court in connection
20 with any motion or at trial unless the party seeking to submit or file the information, for good
21 cause shown, moves to seal the Court's record and proceedings and continue the protections of
22 this order. The parties shall adhere to E.D. Cal. L.R. 39-141. A party who intends to use any
23 information which is designated as confidential in connection with the trial of this action must
24 identify the document in the joint final pretrial order, along with a separate list of the information
25 which is protected as confidential which that party will seek to submit.

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The Court will retain jurisdiction over the parties for purposes of enforcement or modification of this order.

IT IS SO STIPULATED.

Dated: March 12, 2009

KROHN & MOSS, LTD

By: /s/ Nicholas J. Bontrager

NICHOLAS J. BONTRAGER
Attorneys for Plaintiff
GEOFF EMMETT

Dated: March 12, 2009

GORDON & REES LLP

By: /s/ Catherine A. Salah

CATHERINE A. SALAH
Attorneys for Defendant
I.C. SYSTEM, INC.

Based upon the above stipulation and good case showing,

IT IS SO ORDERED. (The court has modified initially stipulated provisions relating to filing documents under seal to comply with case law and the local rules of this court)

Dated: April 9, 2009

/s/ Gregory G. Hollows

UNITED STATES MAGISTRATE JUDGE