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Daniel J. Healy (126730) Kelly J. Trujillo (244286) LAW OFFICE OF DANIEL J. HEALY 601 Carolina St.

Vallejo, California 94590 Telephone: (707) 553-7360 Facsimile: (707) 553-7364

Attorney for Defendant Castle & King, Inc.



MAY 1 1 2010



bc. 17

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA

CALIFORNIA SPORTFISHING PROTECTION ALLIANCE,	CASE NO.: 2:09-CV-00819-FCD-DAD
Plaintiff, Vs.	STIPULATION AND PROTECTIVE ORDER RE: DEFENDANT'S CORPORATE INCOME TAX RETURNS
CASTLE & KING, INC. a corporation, rotection Alliance v Castle & King, Inc.	D

RECITALS

- Plaintiff California Sportsfishing Protection Alliance (CSPA) seeks information regarding defendant Castle and King's net worth in connection with the abovecaptioned matter.
- Defendant Castle and King Rock and Ready Mix, Inc. has agreed to reveal certain information under a protective order in order to maintain its privacy surrounding sensitive financial information.
- 3. Specifically, the parties hereby agree that the following records will be produced under the conditions and covenants contained herein (hereinafter "Disclosed Documents"):
 - a. Corporate Tax Returns Form 1120 for defendant Castle and King Rock and Ready Mix, Inc. for the years of 2007 and 2008.

This stipulation only pertains to the Disclosed Documents and does not affect
plaintiff's ability to seek any additional documents or information from defendant.

STIPULATION

The parties hereby agree as follows:

- The Disclosed Documents shall be kept confidential and used solely in connection with this civil matter, Case Number 2:09-CV-00819-FCD-DAD.
- Under no circumstances shall the Disclosed Documents be used in any
 proceeding other than the instant case or be disseminated, in any form, except
 by court order or as described herein.
- Plaintiff's counsel will be responsible for controlling access to the Disclosed
 Documents to the persons specified in paragraph 4.
- 4. Counsel for Plaintiff is prohibited from releasing, disseminating or sharing the Disclosed Documents or any information contained therein with anyone, with the exception of any other attorneys, experts, consultants or investigators working on this case on behalf of this plaintiff.
- 5. The information provided in the Disclosed Documents is only to be used in connection with this case and the material shall be returned to defendant's counsel at the conclusion of the case.
- 6. Without written permission from defendant's counsel or a court order secured after appropriate notice to all interested persons, a Party may not file in the public record in this action any Disclosed Documents. A Party that seeks to file under seal any Disclosed Documents must comply with Civil Local Rule 141. Protected material may only be filed under seal pursuant to a Court order authorizing the sealing of the specific Disclosed Documents at issue. Pursuant to Civil Local Rule 141, a sealing order will issue only upon a request establishing that the Disclosed Documents at issue is privileged or protectable as a trade secret or otherwise entitled to protection under the law.

1	IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.		
2	DATED: May 11, 2010	/s/ Erik Roper	
3		Erik M. Roper Law Offices of Andrew L. Packard	
4		Attorneys for Plaintiff	
5	,		
6	DATED: May 11, 2010	/s/ Kelly Trujillo	
7		Kelly J. Trujillo Law Office of Daniel J. Healy	
8		Attorneys for Defendants	
9	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
10		Dale A. Dogel	
11	DA	LE A. DROZD	
12		IITED STATES MAGISTRATE JUDGE	
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