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Arrest/booking log identifying all arrestees/inmates booked at the San Joaquin County Jail's jail core facility at any time during the period of July 8 to July 9, 2009; All documents (handwritten, typewritten and electronic) referring to said inmates' names, aliases, housing/cell #s while incarcerated at the jail core, last known address and telephone number, date and time of booking and date and time of release.

(Collectively, the "Subpoenaed Information").

B. The County objected to the production of the Subpoenaed Information on various grounds.

C. Plaintiffs disagree with County's objections and have threatened to file a motion seeking compliance with the Subpoena.

D. Some of the information that is covered by the Subpoena was published by the County on the Internet at or around the time of the incarcerations.

E. The parties have met and conferred and are willing to enter into a compromise under which the County will produce to Plaintiffs certain specific items of information covered by the Subpoena subject to certain protections, set forth in this stipulated protective order.

STIPULATION

IT IS STIPULATED AND AGREED, by the County and Plaintiffs, through their undersigned counsel of record:

1. While reserving all objections, the County shall produce to Plaintiffs the following information (to the extent the County has it) for each detainee booked into the San Joaquin County Jail's jail core facility between 11:59 p.m. on July 8, 2009, and 8:08 a.m. on July 9, 2009: name, alias(es), booking number, date of birth, gender, weight, height, booking date and time, projected release date, arresting agency, type of arrest, charges, bail (the "Detainee Information").

2. Nothing contained in this stipulated protective order shall constitute a waiver of any objections Defendants may assert in response to Plaintiffs' request for Defendants to produce any other documents.

1 3. Plaintiffs and their counsel shall use the Detainee Information only
2 for purposes of this lawsuit and any appeals.

3 4. Plaintiffs and their counsel shall maintain the confidentiality of the
4 Detainee Information. Neither Plaintiffs nor their counsel shall provide a copy of the
5 Detainee Information or any portion of it (whether in paper or electronic form) to anyone
6 or disclose the contents of them to anyone.

7 5. Notwithstanding paragraph 4, above, Plaintiffs and their counsel
8 may provide a copy of the Detainee Information to any expert witness they retain for
9 purposes of testifying in this case or for purposes of providing expert consultation or
10 advice to Plaintiffs or their counsel (collectively, "Expert Witness"). If Plaintiffs or their
11 counsel provide a copy of the Detainee Information (or any portion of it) to an Expert
12 Witness, they shall, at the same time, provide the Expert Witness with a copy of this
13 stipulated protective order and advise the Expert Witness of the contents of it. Plaintiffs'
14 counsel shall maintain, through the final conclusion of this lawsuit and any appeals, a
15 written record of the date on which each Expert Witness was provided with a copy of
16 this stipulated protective order.

17 6. Plaintiffs and their counsel shall maintain the Detainee Information
18 in a folder or other container in a manner designed to preserve the confidential nature
19 of the Detainee Information. The outside of such folder or container shall be
20 conspicuously marked "CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER" and
21 shall have a copy of this stipulated protective order affixed to the outside of it in a
22 manner designed to provide reasonable notice that the folder or container contains
23 confidential records.

24 7. If any of the Detainee Information is marked as an exhibit in a
25 deposition in this case, counsel shall direct the court reporter to place the Detainee
26 Information under seal. In addition, Plaintiffs' counsel shall provide a copy of this
27 stipulated protective order to the court reporter.

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1 8. If Plaintiffs wish to file any of the Detainee Information with the
2 Court (e.g., as an exhibit to a motion), they shall do so only after filing a proper motion
3 with the Court seeking permission to file the document under seal in compliance with
4 Local Rule 141.

5 9. At the conclusion of this lawsuit and any appeals, Plaintiffs and
6 their counsel shall return to Defendants' counsel the Detainee Information and all
7 copies (electronic or paper) of them.

8 Dated: December 21, 2011

THE SUNTAG LAW FIRM
A Professional Corporation

9
10 By: /s/ Dana A. Suntag
DANA A. SUNTAG
Attorneys for All Defendants

11
12 Dated: December 21, 2011

WALKER, HAMILTON & KOENIG LLP

13
14 By: /s/ Peter Koenig
PETER KOENIG
Attorneys for All Plaintiffs

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16 ORDER

17 It is so ordered.

18 Dated: December 21, 2011

19 Dale A. Drozd
DALE A. DROZD
UNITED STATES MAGISTRATE JUDGE

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