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El Dorado Hills County Water District

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

**DAVID MERINO; STEVE MARANVILLE;**  
**KARA MERINO; BRENDA**  
**MARANVILLE,**

**Plaintiffs,**

**vs.**

**EL DORADO HILLS COUNTY WATER**  
**DISTRICT; and DOES 1-50,**

**Defendants.**

**No. 2:10-CV-02152-LKK-DAD**  
**STIPULATED PROTECTIVE ORDER**

In order to preserve and maintain the confidentiality of documents consisting of or related to privacy rights of employees of El Dorado Hills County Water District, counsel for El Dorado Hills County Water District and counsel for Plaintiffs David Merino and Steve Maranville agree and stipulate to the following. (Plaintiffs and Defendant are individually referred to as a "Party." Plaintiffs and Defendant are collectively referred to as the "Parties.")

1. This Stipulated Protective Order governs the production and handling of internal documents that refer, relate to, or name present and past employees of Defendant El Dorado Hills County Water District who are not named in this action.

1           2.     All documents that refer, relate to, or name present and past employees of  
2 Defendant who are not named in this action produced to the Parties shall be used only in  
3 the litigation of the lawsuit entitled David Merino; et al. v. El Dorado Hills County Water  
4 District; et al., Case No. 2:10-CV-02152-LKK-DAD, and in no other action, civil,  
5 administrative, or for any improper purpose.

6           3.     All documents that refer, relate to, or name present and past employees  
7 produced to the Parties shall not, without leave of court, be communicated, in any way, to  
8 anyone other than this Court, the Parties in this action and their counsel, paralegals and  
9 secretaries, except as produced herein. Each party in this action and its counsel shall be  
10 advised of, and bound, by the terms of this Order.

11           4.     The Parties and their counsel agree that counsel may show the documents  
12 referenced in paragraph 1 to the Parties and may use them at deposition, in motions, and  
13 at trial. However, the Parties' counsel shall not give the Parties, or anyone else, copies of  
14 any such document, except to experts, investigators, and/or consultants who agree to the  
15 terms of this Order and the return of the documents at the conclusion of this case.

16           5.     Communication of the contents of the documents pursuant thereto to  
17 persons who are assisting counsel in the preparation and trial of this action, and to persons  
18 who may be called upon to testify in the action with respect to the documents or  
19 information contained therein, shall be permitted, provided that, before obtaining access  
20 to such documents or information, each such person shall be advised that the matters in  
21 those documents should not be discussed outside the context of the action.

22           6.     The Parties and their counsel agree that the documents referenced in  
23 paragraph 1 will be used only for purposes of this litigation and that all such documents,  
24 and any copies of them, will be returned to Defendant El Dorado Hills County Water  
25 District's counsel at the end of this litigation.

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Dated: 2/17/12

MAYALL HURLEY, P.C.

By \_\_\_\_\_ /s/  
WILLIAM J. GORHAM III, Attorneys for  
Defendant, El Dorado Hills County Water District

Dated: 2/17/12

CHOUDHARY LAW OFFICE

By \_\_\_\_\_ /s/  
JOEL RAPAPORT, Attorneys for Plaintiffs,  
DAVID MERINO and STEVE MARANVILLE

**ORDER**

**IT IS SO ORDERED.**

Dated: February 17, 2012

  
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DALE A. DROZD  
UNITED STATES MAGISTRATE JUDGE

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