

1 **MAYALL, HURLEY, P.C.**
A Professional Corporation
2 2453 Grand Canal Boulevard, Second Floor
Stockton, California 95207-8253
3 Telephone (209) 477-3833
MARK E. BERRY, ESQ.
4 CA State Bar No. 155091
DERICK E. KONZ, ESQ.
5 CA State Bar No. 286902

6 Attorneys for Defendant,
Deputy Sheriff JOHN NESBITT
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8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**
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11 **DIONNE SMITH-DOWNS and JAMES E.) No. 2:10-CV-02495-MCE-CKD**
12 **RIVERA, SR., both individually and)**
Successors-In-Interest to the Estate of) STIPULATION FOR PROTECTIVE
13 **JAMES E. RIVERA, JR.) ORDER AND PROPOSED ORDER**
14 **Plaintiffs,)**
15 **vs.)**
16 **Police Officer ERIC AZARVAND; Police)**
Officer GREGORY DUNN; Deputy Sheriff)
17 **JOHN NESBITT)**
18 **Defendants.)**
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20 IT IS HEREBY AGREED AND STIPULATED BETWEEN THE PLAINTIFFS, and
21 DEFENDANTS ERIC AZARVAND, GREGORY DUNN and JOHN NESBITT, that all
22 documents produced in this case pursuant to Fed. Rules Civ. Proc., rules 26, 30, 34 & 45 shall be
23 governed by this protective order.

24 The documents shall be used by the parties solely for the purpose of prosecuting and
25 defending the above captioned case. The documents shall not be duplicated, reproduced,
26 transmitted, or communicated to any person for any reason other than counsel; clients; experts
27 retained for the purpose of furthering the defense of or prosecution of the plaintiff's case;
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1 deposition and trial witnesses; mediator or third party neutral; or the court. The copying of
2 produced documents is to be conducted in-house and shall not be done by outside third party
3 vendors.

4 All copies of protected documents distributed by counsel to any party for purpose of
5 prosecuting or defending the litigation shall be returned to counsel at the conclusion of the
6 litigation and counsel shall store and ultimately destroy the documents consistent with individual
7 firm policy.

8 This Order shall constitute a protective order pursuant to Fed. Rules Civ. Proc., rule 26(c)
9 and shall be enforceable as set forth therein.

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11 STIPULATED AND AGREED.

MAYALL HURLEY, P.C.

/s/ Mark E. Berry

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13 DATED: March 1, 2016

MARK E. BERRY, ESQ.

Attorney for Defendant, JOHN NESBITT

ANGELO, KILDAY & KILDUFF, LLP

/s/ Amie McTavish (as authorized on 2/22/16)

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18 DATED: March 1, 2016

AMIE MCTAVISH, ESQ.

Attorney for Defendants, ERIC AZARVAND and
GREGORY DUNN

LAW OFFICES OF JOHN L. BURRIS

/s/ Benjamin Nisenbaum (as authorized on 2/29/16)

19
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23
24 DATED: March 1, 2016

BENJAMIN NISENBAUM, ESQ.

Attorney for Plaintiffs, DIONNE SMITH-DOWNS and
JAMES E. RIVERA, SR., both individually and as
Successors-In-Interest to the Estate of JAMES E. RIVERA,
JR.,

ORDER

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2 Having considered the stipulation of the parties and good cause appearing, the court
3 hereby GRANTS the parties' foregoing stipulation for a protective order over all documents
4 produced in this case.

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6 IT IS SO ORDERED.

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9 Dated: March 3, 2016



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CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE