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9 Attorneys for Plaintiffs /Petitioners THE ARC OF CALIFORNIA; UNITED CEREBRAL
 10 PALSY ASSOCIATION OF SAN DIEGO

11 IN THE UNITED STATES DISTRICT COURT
 12 EASTERN DISTRICT OF CALIFORNIA
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14 THE ARC OF CALIFORNIA; UNITED)
 CEREBRAL PALSY ASSOCIATION OF)
 15 SAN DIEGO,)

16 Plaintiffs/Petitioners,)

17 vs.)

18 TOBY DOUGLAS, in his official capacity as)
 Director of the California Department of)
 19 Health Care Services; CALIFORNIA)
 DEPARTMENT OF HEALTH CARE)
 20 SERVICES; TERRI DELGADILLO, in her)
 official capacity as Director of the California)
 21 Department of Developmental Services;)
 CALIFORNIA DEPARTMENT OF)
 22 DEVELOPMENTAL SERVICES; and DOES)
 1-100, inclusive,)

23 Defendants/Respondents.)
 24)

Case No. 2:11-CV-02545-MCE-CKD

**STIPULATION AND ORDER
 REGARDING SEALING OF
 DOCUMENTS SUBMITTED BY
 DEFENDANTS AS EXHIBITS A-C TO
 THE DECLARATION OF BRIAN
 WINFIELD**

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1 The parties hereto, by and through their respective attorneys of record, hereby agree and
2 stipulate to seal Exhibits A-C (ECF No. 90-6 at 1-21) to the declaration of Brian Winfield
3 submitted on December 27, 2012 by Defendants in support of their opposition to Plaintiffs'
4 motion for preliminary injunction. Good cause exists for the sealing of these documents because
5 Plaintiffs' contend they contain private information regarding HCBS-DD waiver consumers and
6 their families. Accordingly, in the interests of justice and fairness, the parties hereby request that
7 the Court order the sealing of the documents contained in Exhibits A-C of the Winfield
8 declaration.

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10 Dated: January 2, 2013

LANG, RICHERT & PATCH, P.C.

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12 By: /s/ William T. McLaughlin II
13 William T. McLaughlin II
14 Ashley N. Emerzian
Attorney for Plaintiffs

15 Dated: January 2, 2013

LAW OFFICES OF CHAD CARLOCK

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17 By: /s/ Chad Carlock
18 Chad Carlock
19 Attorney for Plaintiffs

20 Dated: January 2, 2013

Kamala D. Harris
Attorney General of California
Niromi W. Pfeiffer
Supervising Deputy Attorney General
Rebecca M. Armstrong
Deputy Attorney General


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24 By: /s/ Niromi W. Pfeiffer
25 Niromi W. Pfeiffer
26 Supervising Deputy Attorney General
27 Rebecca M. Armstrong
28 Deputy Attorney General
Attorney for Defendants

ORDER

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3 BASED ON THE ABOVE STIPULATION, and GOOD CAUSE appearing, IT IS
4 HEREBY ORDERED that Exhibits A-C attached to the declaration of Brian Winfield, filed in
5 this action at ECF No. 90-6 pages 1-21 be sealed. The Clerk of Court is directed to seal the entire
6 ECF No. 90-6 and Counsel Rebecca Armstrong is directed to file the unsealed portions of 90-6
7 as a new document entry.

8 IT IS SO ORDERED.

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10 Dated: January 15, 2013

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13 MORRISON C. ENGLAND, JR., CHIEF JUDGE
14 UNITED STATES DISTRICT COURT
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