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 6 and the PLACER COUNTY SHERIFF’S DEPARTMENT

7
 8 **UNITED STATES DISTRICT COURT**
 9 **EASTERN DISTRICT OF CALIFORNIA**

| | | | |
|----|--|---|--|
| 11 | THE ESTATE OF ROBERT (BOBBY) |) | Case No. 2:11-CV-02591-LKK-CKD |
| 12 | S. CLIFFORD, LINDA K. CLIFFORD, |) | |
| 13 | individually with right of survivorship |) | STIPULATION FOR PROTECTIVE |
| 14 | and in her capacity as the personal |) | ORDER RE DOCUMENTS |
| 15 | representative of THE ESTATE OF |) | DISCLOSED IN <i>CLIFFORD</i> v. |
| 16 | ROBERT (BOBBY) S. CLIFFORD; |) | <i>PLACER COUNTY, ET AL.</i> |
| 17 | MICHAEL HUTHMAN, individually |) | |
| 18 | with right of survivorship, |) | |
| 19 | |) | |
| 20 | Plaintiffs, |) | |
| 21 | vs. |) | |
| 22 | |) | |
| 23 | PLACER COUNTY, the PLACER |) | |
| 24 | COUNTY SHERIFF’S DEPARTMENT, |) | |
| 25 | DEFENDANT OFFICER JOHN DOE, |) | |
| 26 | individually and in his official capacity as |) | |
| 27 | a police officer, DOES 2-50, Inclusive, |) | |
| 28 | |) | |
| | Defendants. |) | |

24 **I.**
 25 **INTRODUCTION**

26 The parties through their attorneys of record have agreed to the following protective
 27 order to govern the handling of the documents turned over from the Placer County Sheriff’s
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1 Dept. in the *Clifford v. Placer County* case referenced above. The documents subject to the
2 protective order will hereinafter be referred to as “documents.”

3 **II.**

4 **DOCUMENTS SUBJECT TO THE PROTECTIVE ORDER**

5 All documents must be Bates stamped, marked “subject to protective order,” and
6 marked “Clifford.” Counsel for defendants may decide what Placer County documents to
7 designate as subject to the protective order, and shall have them marked as described above.

8 **III.**

9 **PROCEDURE FOR MODIFYING SCOPE OF THIS PROTECTIVE ORDER**

10 If plaintiffs’ counsel wishes to modify the scope of this protective order, he must
11 obtain the written agreement of defendants’ counsel. If defendants’ counsel will not agree
12 in writing to the request, then plaintiffs' counsel must bring a noticed motion to the
13 magistrate assigned to hear discovery matters in this case.

14 **IV.**

15 **RESTRICTIONS IMPOSED BY THIS PROTECTIVE ORDER**

16 Plaintiffs’ counsel, their law office staff and their experts may use and copy the
17 documents subject to the protective order for purposes of the *Clifford v. Placer County*
18 litigation, and for no other purpose. While plaintiffs may view these documents at the
19 discretion of their counsel, plaintiffs may not make, receive or keep copies of these
20 documents.

21 If plaintiffs' counsel wishes for experts to receive a copy of the documents in
22 question, he must have them sign an acknowledgement that they received a copy of the
23 protective order and agree to abide by its terms before turning over the documents or copies
24 thereof. Plaintiffs’ counsel will be responsible for keeping all such acknowledgements of
25 the terms and conditions of the protective order until the conclusion of the case noted above.

26 All persons receiving documents pursuant to this protective order agree to return all
27 copies of the documents to the counsel for defendants at the conclusion of this case.

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I have read the foregoing protective order and agree to abide by its terms and conditions.

Dated: _____

WALSTON CROSS, P.C.

By: _____

ORESTES A. CROSS

Attorney for Plaintiffs the ESTATE OF ROBERT CLIFFORD, LINDA CLIFFORD, individually with right of survivorship and in her capacity as the personal representative of the Estate of Robert Clifford, Michael Huthman, individually with right of survivorship

Dated: March 2, 2012

PLACER COUNTY COUNSEL'S OFFICE

By: /s/ DAVID K. HUSKEY

DAVID K. HUSKEY

Attorneys for Defendants PLACER COUNTY and the PLACER COUNTY SHERIFF'S DEPARTMENT

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ORDER

Having read and considered the foregoing stipulation for a protective order, and good cause appearing therefore, it is hereby ordered that the stipulation for a protective order will be enforced as an order of this court.

IT IS SO ORDERED.

Dated: March 6, 2012


CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE