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5 Attorney for Defendants
 MARILYN PATACSIL,
 6 ERNESTO PATACSIL

7 **UNITED STATES DISTRICT COURT**

8 **EASTERN DISTRICT OF CALIFORNIA-SACRAMENTO**

9 JOSEPH CABARDO, DONNABEL SUYAT,)
 10 MACTABE BIBAT, MARISSA BIBAT,)
 ALICIA BOLLING, AND RENATO) CASE NO.: 2:12 CV 01705 TLN-KJN
 11 MANIPON, CARLINA CABACONGAN,)
 AND JOHN DAVE CABACONGAN, on) **PARTIES STIPULATION TO**
 12 behalf of all current and former employees and) **PROTECTIVE ORDER FOR CIVIL TRIAL**
 the State of California) **AND ORDER (RULE 141.1(b)(2); FRCP 16)**
 13 Plaintiffs,)
 14)
 15)
 16 vs.)
 17)
 MARILYN PATACSIL AND ERNESTO)
 PATACSIL)
 18 Defendants.)
 19)
 20)

21 TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR COUNSEL OF
 22 RECORD:

23 Plaintiffs JOSEPH CABARDO, DONNABEL SUYAT, MACTABE BIBAT, MARISSA
 24 BIBAT, ALICIA BOLLING, AND RENATO MANIPON, CARLINA CABACONGAN, AND JOHN
 25 DAVE CABACONGAN (“Plaintiffs”)and MARILYN PATACSIL AND ERNESTO PATACSIL
 26 (“Defendants”) (collectively the “parties”), by and through their counsel of record, hereby stipulate as
 27 follows:

1 Whereas Defendants are the custodian of records at Patacsil Care Homes, and

2 Whereas Defendants maintained progress notes, awake staff notes, night staff notes and
3 transportation records as business records in the course and scope of their business known as Patacsil
4 Care Homes, and

5 Whereas the progress notes, awake staff notes, night staff notes and transportation records
6 contain the confidential names of residents (aka “consumers”), and confidential information about those
7 residents, and

8 Whereas the progress notes, awake staff notes, night staff notes and transportation records have
9 been redacted by Defendants to remove the full name of the subject resident(s) to protect their privacy,
10 and

11 Whereas the progress notes, awake staff notes, night staff notes and transportation logs are a
12 necessary subject of witness direct examination and cross-examination at trial, and

13 Whereas the parties shall refer to residents by first name or first name and last initial in the
14 progress notes, awake staff notes, night staff notes and transportation logs and

15 Whereas the parties shall generally refer to residents by first name or first name and last initial
16 at trial, and

17 Whereas the necessity for protection should be addressed by court order (rather than by private
18 agreement) to ensure conformance with the stipulation at trial,

19 THEREFORE, the parties hereby stipulate to a protective order for civil trial and (1) the parties
20 shall refer to the resident’s first name or first name and last initial in the progress notes, awake staff
21 notes, night staff notes and transportation logs and (2) generally refer to residents by first name or first
22 name and last initial at trial

23 IT IS SO STIPULATED

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1 Respectfully Submitted

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MALLISON & MARTINEZ

3 DATED: November 16, 2018

By: /s/ Hector Martinez
HECTOR MARTINEZ
Attorney for Plaintiffs
JOSEPH CABARDO, et. al.

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THE LAW OFFICES OF MICHAEL B. LEVIN,
A PROFESSIONAL LAW CORPORATION

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8 DATED: November 16, 2018

By: /s/ Michael B. Levin
MICHAEL B. LEVIN
Attorney for Defendants
MARILYN PATACSIL,
ERNESTO PATACSIL

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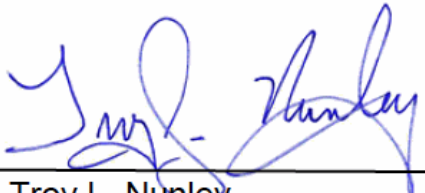
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ORDER

Good cause appearing, the court hereby Grants the Parties' Stipulation to Protective Order such that (1) the parties shall refer to the resident's first name or first name and last initial in the progress notes, awake staff notes, night staff notes and transportation logs and (2) generally refer to residents by first name or first name and last initial at trial; and the parties stipulation is hereby GRANTED.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: November 20, 2018



Troy L. Nunley
United States District Judge