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11 Attorneys for Plaintiff ELSA ROBERTS

12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION
14

15 ELSA ROBERTS,

16 Plaintiff,

17 v.

18 THE PERMANENTE MEDICAL GROUP,
19 INC. aka TPMG, INC., a California
Corporation, RONALD CARRETTI, TRACY
20 NUNES, SHIRLEY HANSON and DOES 1
through 20,
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22 Defendants.
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Case No. 2:12-CV-02506-MCE-CKD

**STIPULATION FOR PROTECTIVE
ORDER AND [PROPOSED] ORDER**

24 The parties hereto, through their respective counsel, stipulate to the following protective order.

25 1. CONFIDENTIAL INFORMATION. The parties consider any and all records or
26 documents produced in response to discovery requests in this case to be Confidential Information,
27 subject to agreement by the parties that the designation should be removed from specified documents.

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1 2. PRODUCTION OF CONFIDENTIAL INFORMATION. Promptly upon this order
2 being entered, filed, and served on the parties, all records produced since the inception of this
3 litigation and any further document production, will be subject to this protective order.

4 3. LIMITATION ON DISCLOSURE OF CONFIDENTIAL INFORMATION. Except
5 with the prior written consent of all the other parties, or upon order of this Court, Confidential
6 Information must not be disclosed to any person other than:

- 7 a. the Court and Court personnel;
- 8 b. the court reporter and videographer (if any) present at any hearing or
9 deposition;
- 10 c. counsel for the respective parties to this litigation, including employees and
11 associates of counsel;
- 12 d. spouses and immediate family of the individually named parties;
- 13 e. persons who authored, prepared, or received the Confidential Information in a
14 context outside this litigation;
- 15 f. the named parties to this litigation, to include any officer or employee of the
16 TPMG, to the extent deemed necessary by counsel for the prosecution or defense of this
17 litigation;
- 18 g. percipient witnesses;
- 19 h. consultants or expert witnesses retained for the prosecution or defense of this
20 litigation.

21 4. LIMITATION ON USE OF CONFIDENTIAL INFORMATION. Persons receiving
22 Confidential Information must not reveal or discuss that information to or with any person who is not
23 entitled to receive the information, except as set forth in this order.

24 5. COPIES OF CONFIDENTIAL INFORMATION. This order does not restrict a person
25 who is properly in the possession of Confidential Information from (1) making working copies,
26 abstracts, digests, and analyses of Confidential Information for use in connection with this litigation or
27 (2) converting or translating Confidential Information into machine readable form for incorporation in
28 a data retrieval system used in connection with this litigation. Any such copies, abstracts, digests,

1 analyses, or data compilations have the same level of protection under the terms of this order as the
2 Confidential Information from which they are derived. (3) Further, this order does not restrict a
3 person who is properly in the possession of Confidential Information from using Confidential
4 Information in support of Motions which are filed through the course of this litigation. Any
5 documents filed with Motions with the Court will be pursuant to Eastern District of California Local
6 Rule 141.1.

7 6. ALL CONFIDENTIAL INFORMATION TO BE USED ONLY FOR THIS CASE.
8 All Confidential Information must be used by the party or parties to whom the Confidential
9 Information is produced solely for the purpose of this case.

10 7. CONCLUSION OF LITIGATION. The conclusion of this action is defined as 30 days
11 after the expiration of the time to appeal or challenge any final judgment or settlement. All provisions
12 of this order restricting the communication or use of Confidential Information continue to be binding
13 after the conclusion of this action, unless otherwise agreed or ordered.

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15 Dated: December _9, 2013

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

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By: S/_____

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Matthew K. Hawkins
Laura N. Erickson
Attorneys for Defendants
THE PERMANENTE MEDICAL
GROUP, INC., RONALD CARETTI,
TRACY NUNES and SHIRLEY
HANSON

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22 Dated: December _6, 2013

NAGELEY, MEREDITH, & MILLER, INC.

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By: S/_____

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Andrea M. Miller
Attorneys for Plaintiff
ELSA ROBERTS

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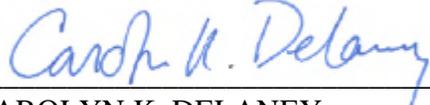
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ORDER

The Stipulation having been reviewed by the Court and good cause shown:

IT IS SO ORDERED.

Dated: December 17, 2013



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE