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13
 14 **UNITED STATES DISTRICT COURT**
 15 **EASTERN DISTRICT OF CALIFORNIA**
 16 **SACRAMENTO DIVISION**

17 KEVIN HUGHEY AND JESSICA
 HUGHEY, Individually on Behalf of
 18 Themselves and On Behalf of Minor Child G.
 H., and G. H.,

19 Plaintiffs,

20 v.

21 ARTURO CAMACHO, FORMER CHIEF
 OF POLICE DAN DRUMMOND,
 22 CURRENT CHIEF OF POLICE THOMAS
 MCDONALD, WEST SACRAMENTO
 23 POLICE DEPARTMENT, CITY OF WEST
 SACRAMENTO, TOD SOCKMAN, JASON
 24 WINGER, LABIN WILSON, TYLER
 RAINEY, ANDREA DONAHUE, CODY
 25 COULTER, CHRIS RICE, MATT
 BOUDINOT, RICH BENTLEY, and DOES
 26 1-20,

27 Defendants.

Case No. 2:13-cv-02665-TLC-AC

**JOINT STIPULATION TO REDACT COURT
 RECORDS AND ORDER**

1 1. This stipulation is entered into between Plaintiffs KEVIN HUGHEY, JESSICA
 2 HUGHEY, and G. H. (“Plaintiffs”) and Defendants ARTURO CAMACHO, DAN DRUMMOND,
 3 THOMAS MCDONALD, WEST SACRAMENTO POLICE DEPARTMENT, CITY OF WEST
 4 SACRAMENTO, TOD SOCKMAN, JASON WINGER, LABIN WILSON, TYLER RAINEY,
 5 ANDREA DONAHUE, CODY COULTER, CHRIS RICE, MATT BOUDINOT and RICH BENTLEY
 6 (collectively “Defendants”), through and by their counsel of record.

7 2. In early January 2019, Plaintiffs were informed that court records containing private
 8 information as to the plaintiff minor child would need to be redacted.

9 **THEREFORE**, the parties, by and through their counsel, stipulate and agree to:

10 1. The Court entering an order, pursuant to Federal Rule of Civil Procedure 5.2 and Local
 11 Rule 140, permitting the parties to: (i) redact and remove any instance in a document filed with the
 12 Court in this proceeding where the full name of the plaintiff minor child is stated and restate only the
 13 initials of the plaintiff minor child and (ii) to redact and remove any instance in a document filed with
 14 the Court in this proceeding where the full home address of the plaintiff minor child is stated and
 15 restate only the city and state where such address is located, in the following documents filed with the
 16 Court in this proceeding:

Docket No.	Document	Location of Proposed Redaction
1	Complaint for Damages	Page 1; lines 12-13, 24, 27, 28 Page 2; line 1 Page 7; lines 9, 17 Page 9; line 11
2	Civil Cover Sheet	Top of page; “Plaintiffs” section
5	Decline of Jurisdiction of United States Magistrate Judge	Bottom of page; “Counsel for ...” section
11	Notice of Related Case	Page 1; lines 14-15
12	Notice of Related Case Order	Page 1; lines 6-7
13	Plaintiffs’ Requests for Entry of Default Judgment	Page 1; lines 10-11, 23

Docket No.	Document	Location of Proposed Redaction
15	Stipulation to Set Aside Default And [Proposed] Order	Page 1; lines 16-17
16	Order	Page 1; lines 16-17
17	Defendants' Notice of Motion and Motion to Dismiss Plaintiffs' Complaint Pursuant to Federal Rule of Civil Procedure 12(B)(6)	Page 1; lines 16-17
17-1	Defendants' Memorandum of Points and Authorities in Support	Page 0; lines 16-17 Page 1; lines 2
18	Notice of Withdrawal of Certain Counsel	Page 1; lines 10-11
19	Proof of Service	Page 1, lines 11-12
20	Notice of Appearance of Co-Counsel	Page 1; lines 11-12, 25
21	Notice of Appearance of Co-Counsel	Page 1; lines 11-12, 25
22	Plaintiffs' Opposition to Defendants' Motion to Dismiss	Page 0; lines 10-11 Page 1; line 1
23	Joint Status Report	Page 1; lines 21-22 Page 2, line 15
24	Defendants' Reply to Plaintiffs' Opposition to Motion to Dismiss Plaintiffs' Complaint	Page 1; lines 16-17
27	Notice of Appearance of Co-Counsel	Page 1; lines 12-13
28	Memorandum and Order	Page 1; lines 13, 27 Page 3; line 9
29	First Amended Complaint for Damages	Page 1; lines 12-13, 23, 26, 28 Page 7; lines 2, 11 Page 9; line 2
30	Defendants' Notice or Motion and Motion to Dismiss Plaintiffs' First Amended Complaint	Page 1; line 15-16
30-1	Memorandum of Points and Authorities in Support	Page 0; lines 15-16 Page 1; line 2

Docket No.	Document	Location of Proposed Redaction
30-2	[Proposed] Order	Page 1; lines 15-16
32	Defendants' Reply to Opposition to Motion to Dismiss Plaintiffs' First Amended Complaint	Page 1; lines 16-17
33	Plaintiffs' Opposition to Defendants' Motion to Dismiss Plaintiffs' First Amended Complaint	Page 1; lines 12-13, 23 Page 3; line 10
33-1	Declaration of Christopher J. Moenig In Support	Page 1; lines 12-13
35	Defendants' Substantive Reply to Opposition to Motion to Dismiss Plaintiffs' First Amended Complaint	Page 1; lines 17-18
37	Memorandum and Order	Page 1; lines 13-14, Page 2; line 3 Page 3; line 20
38	Second Amended Complaint For Damages	Page 1, lines 12-13, 23, 26, 28 Page 7; lines 2,11 Page 9; lines 2
42	Defendants' Answer to Second Amended Complaint	Page 1; lines 15-16 Page 2, line 6
43	Defendant Tod Sockman's Notice of Motion and Motion to Dismiss Plaintiffs' Second Amended Complaint	Page 1; lines 15-16
44	Notice of Association of Counsel	Page 1; lines 13-14, 28 Page 2; lines 15, 19
45	Notice of Withdrawal of Former Counsel	Page 1; lines 12-13
46	Notice of Withdrawal of Former Counsel	Page 1; lines 12-13
47	Notice of Withdrawal of Former Counsel	Page 1; lines 12-13
48	Plaintiffs' Opposition to Defendant Tod Sockman's Motion to Dismiss Plaintiffs' Second Amended Complaint	Page 1; lines 15-16, 17 Page 3; line 13
48-1	Declaration of Christopher J. Moenig In Support	Page 1; lines 15-16 Page 2; line 5

Docket No.	Document	Location of Proposed Redaction
49	Reply to Opposition to Defendant Tod Sockman's Motion to Dismiss Plaintiffs' Second Amended Complaint	Page 1; lines 15-16
51	Order Granting Defendant Tod Sockman's Motion to Dismiss Plaintiffs' Second Amended Complaint	Page 1; lines 12, 24 Page 3; lines 7
52	Third Amended Complaint for Damages	Page 1; lines 15-16, 26 Page 2; lines 2, 3, 4, 7, 11 Page 9; line 2 Page 23; line 21
53	Defendant Tod Sockman's Answer to Third Amended Complaint	Page 1; lines 15-16 Page 2; line 2
57	Updated Joint Status Report	Page 2; line 15 Page 3; line 13
62	Joint Stipulation to Extend Deadline for Expert Discovery	Page 1; lines 15-16
63	Order RE Joint Stipulation to Extend Deadline for Expert Discovery	Page 1; lines 15-16
64	Notice of Motion and Motion for Consolidation	Page 1; lines 9, 16-17
64-1	Memorandum of Points & Authorities in Support	Page 1; lines 9, 16-17
64-2	Declaration of Jesse Ortiz in Support	Page 1; lines 9, 16-17
64-3	Proposed] Order Re: Consolidation of Actions	Page 1; lines 9, 16-17
65	Defendants' Notice of Non-Opposition to Plaintiff's Motion to Consolidate	Page 1; lines 15-16
67	Stipulation And [Proposed] Order to Modify the Pretrial Scheduling Order	Page 1; lines 19-20
70	Ex Parte Application for Order Shortening Time for Notice of Motion and Motion for Approval of Settlement and Compromise of Minor's Claims; Memorandum of Points & Authorities in Support	Page 1; lines 14-15 Page 2; lines 2, 10, 19, 22
70-1	Petition and Order for Appointment of Guardian Ad Litem	Page 1; lines 14-15, 25

Docket No.	Document	Location of Proposed Redaction
70-2	Notice of Motion and Motion for Approval of Settlement and Compromise of Minor's Claims; Memorandum of Points & Authorities in Support	Page 1; lines 14-15 Page 2; line 5
70-3	Memorandum of Points & Authorities in Support of Motion for Approval of Settlement and Compromise of Minor's Claims	Page 0; lines 14-15 Page 1; line 5
70-4	Declaration of Kevin Hughey In Support	Page 1; lines 14-15, 28
70-5	Proof of Service	Page 1; lines 14-15
71	Petition and Order for Appointment of Guardian Ad Litem	Page 1; lines 14-15, 25
72	Notice of Motion and Motion for Approval of Settlement and Compromise of Minor's Claims; Memorandum of Points & Authorities in Support	Page 1; lines 14-15 Page 2, line 5
72-1	Memorandum of Points & Authorities in Support of Motion for Approval of Settlement and Compromise of Minor's Claims	Page 0; lines 14-15 Page 1; line 5
72-2	Declaration of Kevin Hughey in Support	Page 1; lines 14-15, 28
72-3	Proof of Service	Page 1; lines 14-15
74	Notice of Conditional Settlement	Page 1; lines 23, 24
76	Order RE Petition for Appointment of Guardian Ad Litem	Page 1; lines 14-15, 24

2. The Court entering an order requiring the name of the plaintiff minor child be changed to G. H. and changing the address of the plaintiff minor child to the applicable city and state where it appears on the Court's public docket.

3. The Court entering an order permitting the parties to redact any instance in any publicly filed document where the name and/or address of the plaintiff minor child are stated, but which instance was inadvertently omitted from the list of 76 documents included in this Stipulation.

1 4. The parties further agree to complete the redactions contemplated by this Stipulation
2 within 30 days of the entry of an Order approving this Stipulation.

3 5. Plaintiffs' counsel shall provide to Defendants' counsel by email electronic copies of
4 proposed redacted versions of those documents that were initially filed by Defendants for approval
5 prior to submitting such redacted documents to the Court (whether electronically or otherwise). If
6 Defendants' counsel fail to respond to such an email inquiry within five (5) days of the date that it was
7 sent, such failure to respond shall be conclusively deemed to constitute approval to submit such
8 proposed redacted versions of the documents to the Court.

9 **SO STIPULATED.**

10
11 DATED: February 11, 2019

MOENIG LAW

12 /s/ Christopher J. Moenig
13 Christopher J. Moenig
14 Attorney for Plaintiffs

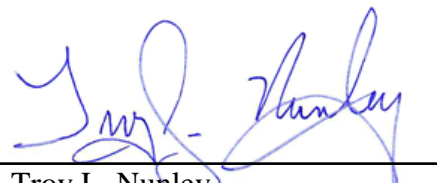
15 DATED: February 11, 2019

ANGELO, KILDAY & KILDUFF, LLP

16
17 /s/ Bruce A. Kilday
18 BRUCE A. KILDAY
19 SEAN D. O'DOWD
20 Attorneys for Defendants

21 **IT IS SO ORDERED.**

22 Dated: February 11, 2019

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25 Troy L. Nunley
26 United States District Judge
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