UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SUKHWINDER KAUR, et al.,

Plaintiffs,

vs.

CITY OF LODI, et al.,

Defendants.

Case No. 2:14-cv-00828-GEB-AC

STIPULATION AND ORDER REGARDING PRODUCTION OF PERSONNEL RECORDS

Pursuant to Local Rule 251, the parties have met and conferred prior to Plaintiffs filing a motion to compel responses to request for production of documents and regarding Defendant's Motion for a Protective Order regarding Peace Officer personnel records and hereby stipulate to the following:

1. Defendant's CITY OF LODI will provide Plaintiffs with documents responsive to their Request for Production, Set One, including those that are contained within the Peace Officers' personnel files, subject to Defendants objections previously asserted.

2. These documents will bear bates stamps with a range of LODI500000-600000 for ease of identification as documents that are covered by this stipulation.

3. These specially designated documents may be disclosed only to counsel, parties, and experts within this litigation.

4. If Plaintiff desires to disclose these specially designated materials identified as Peace Officer personnel records to individuals or organizations outside of the litigation, Plaintiffs' counsel will notify Defense counsel as to the particular documents they wish to disclose.

5. Defense counsel will determine whether or not to seek a protective order regarding the particular documents at issue. Defense counsel will advise Plaintiff with in five (5) days after notification if a protective order will be sought.

6. Plaintiffs' counsel hereby agrees that no disclosure of these designated materials will occur until either: (a) defense counsel informs them in a timely manner that no protective order will be sought, or (b) a ruling is made on Defendants' motion for a protective order.

Accordingly, Defendants withdrew their motion (Docket #40) for a protective order.

DATED: 10/10/14

LAW OFFICE OF MARK E. MERIN

/s/ Mark E. Merin (approved on 10/10/14)
By:_____
Mark E. Merin
Paul H. Masuhara
Attorneys for Plaintiffs

DATED: 10/10/14

ANGELO, KILDAY & KILDUFF

/s/ Amie McTavish
By:_____
AMIE McTAVISH
Attorneys for Defendants CITY OF LODI; CITY OF LODI POLICE DEPARTMENT and CHIEF MARK HELMS

DATED: 10/10/14

OFFICE OF THE CITY ATTORNEY

/s/ Janice D. Magdich (approved on 10/10/14)
By:_____
JANICE D. MAGDICH
Attorneys for Defendants CITY OF LODI; CITY OF LODI POLICE DEPARTMENT and CHIEF MARK HELMS

DATED: 10/10/14

MAYALL HURLEY, P.C.

/s/ Mark E. Berry (approved on 10/10/14)
By:_____
MARK E. BERRY
DERICK KONZ
Attorneys for Defendants, SCOTT BRATTON and ADAM LOCKIE

ORDER

IT IS SO ORDERED.

DATED: October 14, 2014

Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE