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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

**STIPULATED PROTECTIVE ORDER  
REGARDING PRODUCTION OF  
CONFIDENTIAL RECORDS**

1 Following meet and confer discussions, and pursuant to the Plaintiffs' May 12, 2015  
2 correspondence, IT IS HEREBY AGREED AND STIPULATED between all parties that the  
3 following documents contained within Defendant SCOTT BRATTON's Manteca Police  
4 Department personnel file shall be governed by protective order:

- 5 • Bates #66 ("Background Investigation: Psychological Assessment; Memo from  
6 Detective Rall to Chief Weatherford");
- 7 • Bates #67 ("Law Enforcement Psychological Services, Inc. - Psychological  
8 Assessment Report"); and
- 9 • Bates #68 ("Manteca PD Memo from personnel to Chief Weatherford; re results of  
10 psych exam; schedule for physical exam").

11 It is understood that these documents contain private and personal information regarding  
12 SCOTT BRATTON's pre-employment psychological testing by a licensed professional.

13 The produced documents shall be used by the parties solely for the purpose of prosecuting  
14 and defending the above captioned case. The documents shall not be duplicated, reproduced,  
15 transmitted, or communicated to any person or entity for any reason whatsoever excepting  
16 Plaintiff's counsel; Plaintiffs; declared experts pursuant to the Plaintiffs' Rule 26 disclosure;  
17 deposition witnesses at the time of deposition; trial witnesses at the time of trial; mediator or  
18 third party neutral; or the court.

19 The copying of the documents is to be conducted in-house and shall not be done by  
20 outside third party vendors.

21 Even after the termination of this litigation, the confidentiality obligations imposed by  
22 this Order shall remain in effect until SCOTT BRATTON agrees otherwise in writing or a court  
23 order otherwise directs.

24 If any party learns that, by inadvertence or otherwise, it has disclosed documents  
25 protected pursuant to this protective order to any person or in any circumstance not authorized  
26 under this Stipulated Protective Order, that party must immediately (a) notify in writing SCOTT  
27 BRATTON of the unauthorized disclosures, (b) use its best efforts to retrieve all copies of the  
28 protected material, (c) inform the person or persons to whom unauthorized disclosures were

made of all the terms of this Order, and (d) request such person or persons to execute the  
“Acknowledgement and Agreement to Be Bound” that is attached hereto as Exhibit A.

This Order shall constitute a protective order pursuant to Federal Rules of Civil Procedure  
26(c) and shall be enforceable as set forth therein. Plaintiffs’ counsel shall advise the Plaintiffs,  
experts and others of this Protective Order and its effect.

STIPULATED AND AGREED:

DATED: May 26, 2015

**LAW OFFICE OF MARK E. MERIN**

/s/ MARK E. MERIN  
(as authorized on May 26, 2015)

By: \_\_\_\_\_  
Mark E. Merin  
Paul H. Masuhara  
Attorneys for Plaintiffs

DATED: May 28, 2015

**MAYALL HURLEY, P.C.**

/s/ MARK E. BERRY

By: \_\_\_\_\_  
Mark E. Berry  
Derick E. Konz  
Attorneys for Defendants,  
SCOTT BRATTON and  
ADAM LOCKIE

DATED: May 28, 2015


**ANGELO, KILDAY & KILDUFF**

/s/ AMIE MCTAVISH  
(as authorized on May 28, 2015)

By: \_\_\_\_\_  
Amie Mctavish  
Attorneys for Defendants, CITY OF  
LODI; CITY OF LODI POLICE  
DEPARTMENT and CHIEF MARK  
HELMS

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2  
3  
4 DATED: June 4, 2015

  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE

1 EXHIBIT A

2 ACKNOWLEDGEMENT AND AGREEMENT TO BE BOUND

3 I, \_\_\_\_\_ [print or type full name]  
4 of \_\_\_\_\_  
5 [print or type full address], declare under penalty of perjury that I have read in its entirety and  
6 understood the Stipulated Protective Order that was issued by the United States District Court for  
7 the Eastern District of California on \_\_\_\_\_ [date] in the case of KAUR, et al.  
8 v. CITY OF LODI, et al.. I agree to comply with and to be bound by all the terms of this  
9 Stipulated Protective Order and I understand and acknowledge that failure to so comply could  
10 expose me to sanctions and punishment in the nature of contempt. I solemnly promise that I will  
11 not disclose in any manner any information or item that is subject to this Stipulated Protective  
12 Order to any person or entity except in strict compliance with the provisions of this Order.

13 I further agree to submit to the jurisdiction of the United States District Court for the  
14 Eastern District of California for the purpose of enforcing the terms of this Stipulated Protective  
15 Order, even if such enforcement proceedings occur after termination of this action.

16 I hereby appoint \_\_\_\_\_ [print or type full name]  
17 of \_\_\_\_\_  
18 [print or type full address and telephone number] as my California agent for service of process in  
19 connection with this action or any proceedings related to enforcement of the Stipulated Protective  
20 Order.

21  
22 Date: \_\_\_\_\_ City and State where sworn and signed: \_\_\_\_\_

23  
24  
25 Printed name: \_\_\_\_\_

26  
27  
28 Signature: \_\_\_\_\_