

MARK E. MERIN (State Bar No. 043849)
PAUL H. MASUHARA (State Bar No. 289805)

LAW OFFICE OF MARK E. MERIN

1010 F Street, Suite 300
Sacramento, California 95814
Telephone: (916) 443-6911
Facsimile: (916) 447-8336

Attorneys for Plaintiffs SUKHWINDER KAUR, PARMINDER SINGH SHERGILL,
KULBINDER KAUR SOHOTA and SARABJIT SINGH SHERGILL

BRUCE A. KILDAY (State Bar No. 066415)
AMIE McTAVISH, ESQ. (State Bar No. 242372)

ANGELO, KILDAY & KILDUFF, LLP

Attorneys at Law
601 University Avenue, Suite 150
Sacramento, CA 95825
Telephone: (916) 564-6100
Telecopier: (916) 564-6263

Attorneys for Joint-Defendants CITY OF LODI; CITY OF LODI POLICE DEPARTMENT and
CHIEF MARK HELMS

MARK E. BERRY (State Bar No. 155091)
DERICK E. KONZ (State Bar No. 286902)

MAYALL HURLEY, P.C.

A Professional Corporation
2453 Grand Canal Boulevard, Second Floor
Stockton, California 95207-8253
Telephone: (209) 477-3833
Facsimile: (209) 473-4818

Attorneys for Joint-Defendants SCOTT BRATTON and ADAM LOCKIE.

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
TELEPHONE RECORDS**

1 Following meet and confer discussions, and pursuant to the Plaintiffs' May 26, 2015
2 correspondence, IT IS HEREBY AGREED AND STIPULATED between all parties that the
3 following documents produced by SCOTT BRATTON and ADAM LOCKIE shall be governed
4 by protective order:

- 5 • SCOTT BRATTON's Response to SUKHWINDER KAUR's Request for Production
6 of Documents, Set Two.
- 7 • SCOTT BRATTON's Response to SUKHWINDER KAUR's Interrogatories, Set
8 One.
- 9 • ADAM LOCKIE's Response to SUKHWINDER KAUR's Request for Production of
10 Documents, Set Two.
- 11 • ADAM LOCKIE's Response to SUKHWINDER KAUR's Interrogatories, Set One

12 It is understood that these documents contain private telephone information of SCOTT
13 BRATTON and ADAM LOCKIE. If this information is released to the public, there is a concern
14 that SCOTT BRATTON and ADAM LOCKIE will be exposed to harassment by members of the
15 public who would otherwise not have access to their personal telephone numbers.

16 The produced documents shall be used by the parties solely for the purpose of prosecuting
17 and defending the above captioned case. The documents shall not be duplicated, reproduced,
18 transmitted, or communicated to any person or entity for any reason whatsoever excepting
19 Plaintiff's counsel and declared experts pursuant to the Plaintiffs' Rule 26 disclosure.

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

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

25 If any party learns that, by inadvertence or otherwise, it has disclosed documents
26 protected pursuant to this protective order to any person or in any circumstance not authorized
27 under this Stipulated Protective Order, that party must immediately (a) notify in writing SCOTT
28 BRATTON and ADAM LOCKIE of the unauthorized disclosures, (b) use its best efforts to

1 retrieve all copies of the protected material, (c) inform the person or persons to whom
2 unauthorized disclosures were made of all the terms of this Order, and (d) request such person or
3 persons to execute the "Acknowledgement and Agreement to Be Bound" that is attached hereto
4 as Exhibit A.

5 This Order shall constitute a protective order pursuant to Federal Rules of Civil Procedure
6 26(c) and shall be enforceable as set forth therein. Plaintiffs' counsel shall advise the Plaintiffs,
7 experts and others of this Protective Order and its effect.

8 STIPULATED AND AGREED:

9
10 DATED: June 3, 2015

LAW OFFICE OF MARK E. MERIN

/s/ MARK E. MERIN
(as authorized on June 3, 2015)

By: _____

Mark E. Merin
Paul H. Masuhara
Attorneys for Plaintiffs

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16 DATED: June 3, 2015

MAYALL HURLEY, P.C.

/s/ MARK E. BERRY

By: _____

Mark E. Berry
Derick E. Konz
Attorneys for Defendants,
SCOTT BRATTON and
ADAM LOCKIE

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22 DATED: June 3, 2015

ANGELO, KILDAY & KILDUFF

/s/ AMIE MCTAVISH
(as authorized on June 3, 2015)


By: _____

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

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

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: _____

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24
25 Printed name: _____

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28 Signature: _____