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 7 A FAMILY AFFAIR, INC., a California Corporation; A
 FAMILY AFFAIR BRIDGES, INC., a California
 8 Corporation; CAROLYN FAYE MITCHEL dba A FAMILY
 AFFAIR CARE; CAROLYN FAYE MITCHELL, dba A
 9 FAMILY AFFAIR CARE III; CAROLYN FAYE
 MITCHEL dba A FAMILY AFFAIR CARE II; CAROLYN
 10 FAYE MITCHELL, an individual; CAROLYN FAYE
 MITCHELL, also known as CAROLYN F. MITCHELL, an
 11 individual; CAROLYN FAYE MITCHELL, also known as
 CAROLYN R. MITCHELL, an individual; CAROLYN
 12 FAYE MITCHELL, also known as CAROLYN
 MITCHELL, an individual; KASSIA MITCHELL
 13 LUCERO, an individual; KASSIA MITCHELL LUCERO,
 also known as KASSIA MITCHELL, an individual;
 14 KASSIA MITCHELL LUCERO, also known as KASSIA
 LUCERO, an individual; KASSIA MITCHELL LUCERO,
 15 also known as K.M. LUCERO, an individual; MARVIN R.
 MITCHELL, JR., an individual; MARVIN R. MITCHELL,
 16 SR., an individual; PATRICK CAIN, an individual;
 ALBERT JOHNSON, an individual

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 18 **UNITED STATES DISTRICT COURT**
 19 **EASTERN DISTRICT OF CALIFORNIA**

20 RONNIE SALVADOR ,) Case No. 2:14-CV-01082-KJM-EFB
 21)
 Plaintiff,)
 22 vs.) [Removed from Sacramento County Superior
) Court Case No. 34-2013-00155976-CU-OE-
) GDS]
 23 A FAMILY AFFAIR, INC., a California)
 Corporation; A FAMILY AFFAIR BRIDGES,) **STIPULATION AND [PROPOSED]**
 24 INC., a California Corporation; CAROLYN) **PROTECTIVE ORDER REGARDING**
 FAYE MITCHEL dba A FAMILY AFFAIR) **CONFIDENTIAL INFORMATION**
 25 CARE; CAROLYN FAYE MITCHELL, dba A)
 FAMILY AFFAIR CARE III; CAROLYN FAYE)
 26 MITCHEL dba A FAMILY AFFAIR CARE II;)
 CAROLYN FAYE MITCHELL, an individual;)
 27 CAROLYN FAYE MITCHELL, also known as)
 CAROLYN F. MITCHELL, an individual;)
 28 CAROLYN FAYE MITCHELL, also known as)

**STIPULATION AND [PROPOSED]
 PROTECTIVE ORDER REGARDING
 CONFIDENTIAL INFORMATION**

1 CAROLYN R. MITCHELL, an individual;)
CAROLYN FAYE MITCHELL, also known as)
2 CAROLYN MITCHELL, an individual; KASSIA)
MITCHELL LUCERO, an individual; KASSIA)
3 MITCHELL LUCERO, also known as KASSIA)
MITCHELL, an individual; KASSIA)
4 MITCHELL LUCERO, also known as KASSIA)
LUCERO, an individual; KASSIA MITCHELL)
5 LUCERO, also known as K.M. LUCERO, an)
individual; MARVIN R. MITCHELL, JR., an)
6 individual; MARVIN R. MITCHELL, SR., an)
individual; ESTATE OF MARVIN R.)
7 MITCHELL, SR., DECEASED; PATRICK)
CAIN, an individual; ALBERT JOHNSON, an)
8 individual; and DOES 1 to 50, Inclusive,)
)
9 Defendants.)
)

11 **ADDITIONAL COUNSEL**

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21 Attorneys for Plaintiff,
RONNIE SALVADOR

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1 Plaintiff RONNIE SALVADOR and Defendants A FAMILY AFFAIR, INC., a California
2 Corporation; A FAMILY AFFAIR BRIDGES, INC., a California Corporation; CAROLYN
3 FAYE MITCHEL dba A FAMILY AFFAIR CARE; CAROLYN FAYE MITCHELL, dba A
4 FAMILY AFFAIR CARE III; CAROLYN FAYE MITCHEL dba A FAMILY AFFAIR CARE
5 II; CAROLYN FAYE MITCHELL, an individual; CAROLYN FAYE MITCHELL, also known
6 as CAROLYN F. MITCHELL, an individual; CAROLYN FAYE MITCHELL, also known as
7 CAROLYN R. MITCHELL, an individual; CAROLYN FAYE MITCHELL, also known as
8 CAROLYN MITCHELL, an individual; KASSIA MITCHELL LUCERO, an individual;
9 KASSIA MITCHELL LUCERO, also known as KASSIA MITCHELL, an individual; KASSIA
10 MITCHELL LUCERO, also known as KASSIA LUCERO, an individual; KASSIA MITCHELL
11 LUCERO, also known as K.M. LUCERO, an individual; MARVIN R. MITCHELL, JR., an
12 individual; MARVIN R. MITCHELL, SR., an individual; ESTATE OF MARVIN R.
13 MITCHELL, SR., DECEASED; PATRICK CAIN, an individual; ALBERT JOHNSON
14 (hereinafter collectively referred to as "Parties") hereby agree as follows:

15 1. In this action, the Parties may be required to disclose confidential information. The
16 Parties agree that good cause exists for such confidential information to be protected from
17 unnecessary disclosure. In order to avoid unnecessary litigation regarding the disclosure of
18 such confidential information and to facilitate the exchange of information in this litigation, the
19 Parties agree to this Protective Order to accomplish these tasks.

20 2. For purposes of this Stipulation and Protective Order, the Parties agree that
21 the definition of "Confidential Information" shall include:

- 22 a. Proprietary information, including, but not limited to, all financial data concerning
23 the Parties, including tax information, to the extent such information has not
24 already been made known to the general public;
- 25 b. Other proprietary information of a commercial nature that the Producing
26 Party believes, in good faith, constitutes a trade secret under applicable law;
- 27 c. Personal information relating to individual persons, including personal finance
28 information or other information that the Producing Party believes, in good faith,

1 may implicate privacy laws if further disseminated.

2 3. "Producing Party" means any party or third party that produces documents or
3 information as part of the parties' informal discovery process to advance settlement
4 discussions or pursuant to discovery requests, in support of dispositive motions, or otherwise,
5 in the course of this litigation.

6 4. Any Producing Party may designate as "CONFIDENTIAL" any material, documents
7 or discovery responses, testimony or other information, which constitutes or contains Confidential
8 Information, as follows: Documents containing Confidential Information, which are produced as
9 part of the parties' informal discovery process or in responses to document requests, subpoenas or
10 otherwise, shall be marked by the Producing Party with the following legend: CONFIDENTIAL.

11 Any other Confidential Information conveyed by the Producing Party during this
12 litigation, if in written or other tangible form, shall be marked with the legend set forth in
13 subparagraph (a) above, or, if in oral or other intangible form, identified as: Confidential
14 Information.

15 5. This Order only permits designation as Confidential Information that information
16 as to which the Producing Party entertains a good faith belief that the information satisfies the
17 definition of Confidential Information contained in Paragraph 2.

18 6. Persons receiving Confidential Information shall use it solely for the purpose of
19 this litigation. Confidential Information shall not be disclosed directly or indirectly to any other
20 person other than as provided in this Order, except by written agreement of the Producing Party.

21 7. A person having custody of Confidential Information shall maintain it in a manner
22 which ensures that access to Confidential Information is strictly limited to persons entitled to
23 receive Confidential Information in accordance with the provisions of this Order.

24 8. Confidential Information may not be disclosed to any person other than:

25 a. attorneys for the Parties;

26 b. experts or consultants of a party, provided the requirements of Paragraph 7 of
27 this Order are met;

28 9. Within thirty days after the conclusion of this litigation, including all appeals, all

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Joel Van Parys
Attorneys for Defendants
A FAMILY AFFAIR, INC., et al.

Dated: December 24, 2014

LAW OFFICE OF MICHAEL J. HARRINGTON

signature on original

By: _____
Michael J. Harrington
Attorneys for Plaintiff Ronnie Salvador

Dated: December 24, 2014

GUICHARD, TENG & PORTELLO, A.P.C.

signature on original

By: _____
William L. Portello
Attorneys for Plaintiff Ronnie Salvador

ORDER

Having reviewed the foregoing Stipulation and Protective Order submitted by the parties and good causing appearing therefore, it is ordered that the Protective Order shall be entered as the order of this Court.

IT IS SO ORDERED.

Dated: January 13, 2015.



EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE