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13    1 A FAMILY AFFAIR, INC., a California Corporation; A  
14    1 FAMILY AFFAIR BRIDGES, INC., a California  
15    1 Corporation; CAROLYN FAYE MITCHEL dba A FAMILY  
16    1 AFFAIR CARE; CAROLYN FAYE MITCHELL, dba A  
17    1 FAMILY AFFAIR CARE III; CAROLYN FAYE  
18    1 MITCHEL dba A FAMILY AFFAIR CARE II; CAROLYN FAYE  
19    1 MITCHELL, an individual; CAROLYN FAYE  
20    1 MITCHELL, also known as CAROLYN F. MITCHELL, an  
21    1 individual; CAROLYN FAYE MITCHELL, also known as  
22    1 CAROLYN R. MITCHELL, an individual; CAROLYN  
23    1 FAYE MITCHELL, also known as CAROLYN  
24    1 MITCHELL, an individual; KASSIA MITCHELL  
25    1 LUCERO, an individual; KASSIA MITCHELL LUCERO,  
26    1 also known as KASSIA MITCHELL, an individual;  
27    1 KASSIA MITCHELL LUCERO, also known as KASSIA  
28    1 LUCERO, an individual; KASSIA MITCHELL LUCERO,  
29    1 also known as K.M. LUCERO, an individual; MARVIN R.  
30    1 MITCHELL, JR., an individual; MARVIN R. MITCHELL,  
31    1 SR., an individual; PATRICK CAIN, an individual;  
32    1 ALBERT JOHNSON, an individual

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

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

STIPULATION AND [PROPOSED]  
PROTECTIVE ORDER REGARDING  
CONFIDENTIAL INFORMATION

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

## **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

1 documents designated as CONFIDENTIAL, all copies of such documents, in the possession,  
2 custody or control of the Parties and their experts, investigators, advisors, or consultants shall be  
3 destroyed or returned to counsel for the Producing Party. Upon request, a party and its counsel  
4 shall separately provide written certification to the Producing Party that the actions required by  
5 this paragraph have been completed. Upon request, a Producing Party may require that all  
6 CONFIDENTIAL documents, including any copies of CONFIDENTIAL documents, are returned  
7 within 14 days to the Producing Party.

8       10. This Order shall be without prejudice to the right of any party (a) to oppose  
9 production of any information on any grounds allowed under the Federal Rules of Civil  
10 Procedure, and decisional authority, (b) to use its own Confidential Information in any manner  
11 that Producing Party desires, or (c) to seek and obtain, on an appropriate showing, such  
12 additional protection with respect to Confidential Information as that party may consider  
13 appropriate.

14       11. Any violation of the terms of this Protective Order may result in the imposition of  
15 such relief as the Court deems appropriate. All provisions of this Stipulation shall be binding on  
16 the Parties at signing, whether the Court enters the Stipulation as an Order or not. All  
17 provisions of this Order restricting the communication or use of Confidential Information shall  
18 continue to be binding after the conclusion of this action, including all appeals, unless otherwise  
19 agreed or ordered. The Court shall retain jurisdiction to enforce this Protective Order beyond the  
20 conclusion of this litigation, including personal jurisdiction over all persons subject to this  
21 Order.

22           IT IS SO STIPULATED:

23  
24 Dated: December 24, 2014

CAROTHERS DISANTE & FREUDENBERGER LLP

25  
26 By: /S/ Joel Van Parys

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