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8 UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
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11 VICKEY NORTON-PIMENTEL,
12 Plaintiff,
13 v.
14 LOWE'S HOME CENTERS, LLC,
15 Defendant.
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No. 2:14-cv-02231-TLN-AC

STIPULATED PROTECTIVE ORDER

17 On June 10, 2015, the parties submitted a proposed stipulated protective order. ECF No.
18 12. That stipulated protective order reads as follows:

19 Plaintiff, VICKEY NORTON-PIMENTEL, ("Plaintiff"), and
20 Defendant, LOWE HOME CENTERS, LLC ("Defendant"), jointly
21 submit this Stipulated Protective Order pursuant to United States
22 District Court, Eastern District of California Local Rules
23 141.1(b)(1) limiting the use and disposition of certain information
24 and documents during litigation of this matter. The parties agree
25 that discovery in this action may yield documents and information
26 of a sensitive and confidential nature, including but not limited to,
27 Defendant's proprietary policies and procedures, personnel files of
28 present and former employees, incident reports, and other
confidential information that may be subject to discovery in the
proceedings in this matter but which should not be made available
to the public generally. As a result, the parties have agreed to this
jointly submitted Stipulated Protective Order and request that it be
adopted by order of this Court.

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1 purposes of preparation for and trial of this action. Under no
2 circumstances shall information or materials covered by this
3 Protective Order be disclosed to anyone other than Plaintiff's
4 counsel of record in this action, paralegals, secretarial employees
5 under counsel's direct supervision, and such persons employed to
6 act as experts in this action. At the conclusion of the proceedings in
this action, all documents and information subject to this Order,
including any copies or extracts or summaries thereof, or
documents containing information taken therefrom, shall be
returned to counsel for the Defendant, at defense counsel's written
request.

7 3. Prior to disclosure of any documents designated as
8 "confidential" to paralegals or secretarial employees of counsel or
9 Plaintiff, counsel for Plaintiff shall require such employees to read
this Protective Order and agree to be bound by its terms.

10 4. If counsel for Plaintiff determines that for purposes
11 of this action, documents or information produced by the Defendant
12 and designated as "confidential" must be revealed to a person
employed to act as an expert in this action, then counsel may reveal
the designated documents or information to such person, after first
complying with the following:

13 (a) Counsel for the Plaintiff shall have the expert read
14 this Order and shall explain the contents thereof to such
expert.

15 (b) Counsel for the Plaintiff shall require such expert to
16 sign a copy of this protective order that states: "I have read
17 and understood the terms of this protective order. I further
18 agree to be bound by its terms." Nothing in this paragraph
19 shall be deemed to enlarge the right of Defendant to conduct
discovery of any of Plaintiff's experts, except solely with
respect to the ability of such expert to protect confidential
information and documents from re-disclosure.

20 5. The Court's Order is subject to revocation and
21 modification by Order of the Court upon written stipulation of the
parties, or upon motion and reasonable notice, including
opportunity for hearing and presentation of evidence.

22 6. Nothing contained in this Order is intended or
23 should be construed as authorizing a party in this action to disobey
a lawful subpoena issued in another action.

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1 Based on the foregoing, Plaintiff VICKY NORTON-
2 PIMENTEL and Defendant LOWE'S HOME CENTERS, LLC
3 hereby request that this Court issue a protective order governing the
4 treatment of confidential information in this matter.


5 **IT IS SO STIPULATED.**

6 ECF No. 12.

7 **ORDER**

8 PURSUANT TO STIPULATION, IT IS SO ORDERED.

9 DATED: June 11, 2015

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11 ALLISON CLAIRE
12 UNITED STATES MAGISTRATE JUDGE
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