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 13 Attorney for Plaintiff,
 JONATHAN EARL DANNER

14
 15 **UNITED STATES DISTRICT COURT**
 16 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

18	JONATHAN EARL DANNER,)	Case No.: 2:15-cv-00887-MCE-EFB
)	
19	Plaintiff,)	STIPULATION FOR PROTECTIVE
)	ORDER AND PROPOSED ORDER
20	vs.)	
)	
21	THE COUNTY OF SAN JOAQUIN, and)	
22	MANUEL ANDRADE,)	
)	
23	Defendants.)	
)	
24)	

25
 26 It is hereby agreed and stipulated between the Plaintiff, JONATHAN EARL DANNER
 27 and Defendants COUNTY OF SAN JOAQUIN and MANUEL ANDRADE that all documents

1 produced in this case pursuant to Fed. Rules Civ. Proc., rules 26, 30, 34 & 45 shall be governed
2 by this protective order.

3 The documents shall be used by the parties solely for the purpose of prosecuting and
4 defending the above captioned case. The documents shall not be duplicated, reproduced,
5 transmitted, or communicated to any person for any reason other than counsel; clients; experts
6 retained for the purpose of furthering the defense of or prosecution of the plaintiff's case;
7 deposition and trial witnesses; mediator or third party neutral; or the court. The copying of
8 produced documents is to be conducted in-house and shall not be done by outside third party
9 vendors.

10 All copies of protected documents distributed by counsel to any party for purpose of
11 prosecuting or defending the litigation shall be returned to counsel at the conclusion of the
12 litigation.

13 This Order shall constitute a protective order pursuant to Fed. Rules Civ. Proc., rule 26(c)
14 and shall be enforceable as set forth therein.

15
16 **STIPULATED AND AGREED.**

17
18 **DATED: June 22, 2016**

MAYALL HURLEY, P.C.

/s/ Mark E. Berry

19
20 By _____

MARK E. BERRY, ESQ.
Attorney for Defendants, COUNTY OF SAN
JOAQUIN and MANUEL ANDRADE

21
22
23 **DATED: June 22, 2016**

THE LAW OFFICE OF JUSTIN KIRK TABAYOYON

/s/ Justin Kirk Tabayoyon
(as authorized on 6/22/16)

24
25
26 By _____

JUSTIN KIRK TABAYOYON, ESQ.
Attorney for Plaintiff, JONATHAN EARL
DANNER

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ORDER

Having considered the stipulation of the parties and good cause appearing, the court hereby GRANTS the parties' foregoing stipulation for a protective order over all documents produced in this case.

IT IS SO ORDERED.

DATED: June 22, 2016



EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE