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9 **UNITED STATES DISTRICT COURT**

10 **EASTERN DISTRICT OF CALIFORNIA**

11 GUILLERMO BONILLA-CHIRINOS, ) Case No.: 2:15-cv-02564-WBS-EFB

12 SANDRA HERNANDEZ, INDIVIDUALLY )

13 AND AS GUARDIANS AD LITEM OF J B, )

14 A MINOR )

**STIPULATION FOR PROTECTIVE  
ORDER AND PROPOSED ORDER**

15 Plaintiffs, )

16 vs. )

17 CITY OF WEST SACRAMENTO, )

18 KENNETH FELLOWS (BADGE #151) AND )

19 DOES 1 THROUGH 99, )

20 Defendants. )

21 IT IS HEREBY AGREED AND STIPULATED BETWEEN THE PLAINTIFFS, AND  
22 DEFENDANTS CITY OF WEST SACRAMENTO AND KENNETH FELLOWS, all  
23 documents produced in this case pursuant to Fed. Rules Civ. Proc., rules 26, 30, 34 & 45 shall be  
24 governed by this protective order.

25 The documents shall be used by the parties solely for the purpose of prosecuting and  
26 defending the above-captioned case. The documents shall not be duplicated, reproduced,  
27 transmitted, or communicated to any person for any reason other than counsel; clients; experts  
28 retained for the purpose of furthering the defense of or prosecution of the plaintiffs' case;

1 deposition and trial witnesses; mediator or third party neutral; or the court. The copying of  
2 produced documents is to be conducted in-house and shall not be done by outside third party  
3 vendors.

4 All copies of protected documents distributed by counsel to any party for purpose of  
5 prosecuting or defending the litigation shall be returned to counsel at the conclusion of the  
6 litigation and counsel shall store and ultimately destroy the documents consistent with individual  
7 firm policy.

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

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Dated: April 21, 2016

ANGELO, KILDAY & KILDUFF, LLP

*/s/ Sean D. O'Dowd*

By: \_\_\_\_\_

AMIE McTAVISH  
SEAN D. O'DOWD  
Attorneys for Defendants  
CITY OF WEST SACRAMENTO and  
KENNETH FELLOWS

Dated: April 14, 2016

LAW OFFICE OF ARMANDO S.  
MENDEZ

*/s/ Armando S. Mendez (as authorized on  
4/14/2016)*

By: \_\_\_\_\_

ARMANDO S. MENDEZ  
Attorney for Plaintiffs

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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: April 21, 2016



EDMUND F. BRENNAN  
UNITED STATES MAGISTRATE JUDGE