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Attorneys for Defendants
SPRINT SOLUTIONS, INC. and
NEXTEL OF CALIFORNIA, INC.
[Additional counsel on signature page]

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

CITY OF LOS ANGELES, *ex rel.* RICHARD
KNUDSEN,

Plaintiffs,

vs.

SPRINT SOLUTIONS, INC.; NEXTEL OF
CALIFORNIA, INC., D/B/A NEXTEL
COMMUNICATIONS AND SPRINT
NEXTEL; and DOES 1-10,

Defendants.

Case No. 2:17-cv-00811-TLN-AC

**Date Action Was Transferred from
Central District of California:
April 18, 2017**

**[PROPOSED] SUPPLEMENTAL
STIPULATION AND PROTECTIVE
ORDER REGARDING PRODUCTION
OF CERTAIN CUSTOMER
INFORMATION**

**Judge: Hon. Troy L. Nunley
Trial Date: None set**

1 **[PROPOSED] STIPULATION & PROTECTIVE ORDER**

2 WHEREAS Plaintiff City of Los Angeles has served on Defendants Sprint Solutions, Inc. and
3 Nextel of California, Inc., d/b/a Nextel Communications and Sprint Nextel (“Defendants”) Requests
4 for Production of Documents;

5 WHEREAS Defendants have agreed to produce relevant, responsive, non-privileged
6 documents in accordance with the parties’ ongoing meet and confers, some of which may contain
7 information subject to confidentiality limitations;

8 WHEREAS the parties wish to facilitate the exchange of relevant, responsive, non-privileged
9 information and documents which may be subject to such confidentiality limitations;

10 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the
11 parties hereto, through their respective counsel, that:

12 1. *Definitions.* Capitalized terms not otherwise defined in this Supplemental Stipulation
13 & Protective Order are defined in the Protective Order, Dkt. 88, entered on August 15, 2017,
14 Dkt. 90.

15 a. *Other Customer Documents.* Other Customer Documents means documents containing
16 certain information related to customers of Defendants other than Plaintiffs, including,
17 for example, documents containing information related to both Plaintiffs and other
18 customers of Defendants. Other Customer Documents contain information that may be
19 protected from disclosure by (1) the restrictions on the production of Customer
20 Proprietary Network Information (“CPNI”), as defined by 47 U.S.C. § 222(h); (2)
21 section 2891 of the California Public Utility Code; (3) provisions of Defendants’
22 contracts with their Other Customers; and (4) other similar laws or provisions restricting
23 dissemination of personal or confidential information.

24 2. *Production of Other Customer Documents.* Subject to and without waiving any
25 objections, Defendants may produce relevant, responsive, non-privileged Other Customer
26 Documents. Subject to and without waiving any objections, including but not limited to relevance,
27 Defendants will label or mark Other Customer Documents as “Highly Confidential” documents
28

1 under the Protective Order in this action, subject to all terms of the existing Protective Order,
2 including but not limited to Plaintiffs' right to challenge the confidentiality designation of any
3 document produced.

4 **IT IS SO AGREED UPON AND STIPULATED.**

5
6 Dated: November 24, 2020

WILLIAMS & CONNOLLY LLP

John E. Joiner
William P. Ashworth

BAKER & MCKENZIE LLP

Colin H. Murray
Anne M. Kelts

11 By: ./s/ William P. Ashworth

William P. Ashworth
Attorneys for Sprint Defendants
SPRINT SOLUTIONS, INC. and
NEXTEL OF CALIFORNIA, INC.

14 Dated: November 24, 2020

COTCHETT PITRE & MCCARTHY, LLP

16 By: ./s/ Eric J. Buescher

Eric J. Buescher
Attorneys for Plaintiff
CITY OF LOS ANGELES

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ATTESTATION

I, William P. Ashworth, attest that I am one of the attorneys for the Sprint Defendants, and as the ECF user and filer of this document, I attest that concurrence in the filing of this document has been obtained from its signatories.

Date: November 24, 2020

/s/ William P. Ashworth
William P. Ashworth

1 **CITY OF LOS ANGELES, ex rel. RICHARD KNUDSEN v. SPRINT SOLUTIONS, INC.,**
2 **U.S. District Court For The Eastern District Of California - Case No. 2:17-CV-0811-TLN-AC**

3
4 **ORDER**

5 **IT IS SO ORDERED.**

6 DATED: November 30, 2020

7 
8 ALLISON CLAIRE
9 UNITED STATES MAGISTRATE JUDGE