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 10 BREANNA ADAMS

11 **UNITED STATES DISTRICT COURT**  
 12 **EASTERN DISTRICT OF CALIFORNIA**

13 CHERYL CRUZ, et al.,	)	Case No.: 2:17-cv-01628-MCE-EFB
	)	
14 Plaintiffs,	)	
	)	<b>STIPULATION FOR PROTECTIVE</b>
15 vs.	)	<b>ORDER; ORDER THEREON</b>
	)	
16 CITY OF ROCKLIN, et al.,	)	
	)	
17 Defendants.	)	

19 IT IS HEREBY AGREED AND STIPULATED BETWEEN THE PLAINTIFF, AND  
 20 DEFENDANTS CITY OF ROCKLIN, CHRIS OSBORN, JOHN CONSTABLE, AND  
 21 BREANNA ADAMS (hereinafter collectively referred to as "the Parties"), that all documents  
 22 produced in this case pursuant to Fed. Rules Civ. Proc., rules 26, 30, 34 & 45 shall be governed  
 23 by this protective order.

24 Absent a separate agreement between the Parties, in writing, all documents produced in  
 25 this case shall be used by the Parties solely for the purpose of prosecuting and defending the  
 26 above-captioned case. The documents shall not be duplicated, reproduced, transmitted, or  
 27 communicated to any person for any reason other than counsel; clients; experts retained for the  
 28 purpose of furthering the defense of or prosecution of the Plaintiff's case; deposition and trial

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

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

7 Nothing in this agreement shall be interpreted to limit Plaintiff's ability to obtain and  
8 disseminate documents procured outside this litigation, including, but not limited to, documents  
9 obtained pursuant to a request under the California Public Records Act (Gov. Code § 6250 *et.*  
10 *seq.*).

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

3 The above is stipulated to by the respective counsel for the parties as follows:

4 **IT IS SO STIPULATED.**

5  
6 Dated: January 3, 2018

ANGELO, KILDAY & KILDUFF, LLP

7 */s/ Sean D. O'Dowd*

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

BRUCE A. KILDAY

SEAN D. O'DOWD

Attorneys for Defendants

CITY OF ROCKLIN, CHRIS OSBORN,

JOHN CONSTABLE and BREANNA

ADAMS

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14 Dated: December 20, 2017

LAW OFFICE OF KELLAN PATTERSON

15 */s/ Kellan Patterson [as authorized*  
16 *12/20/17]*


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

KELLAN PATTERSON

Attorneys for Plaintiffs

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20 **IT IS SO ORDERED.**

21 Dated: January 3, 2018

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MORRISON C. ENGLAND, JR.  
24 UNITED STATES DISTRICT JUDGE  
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