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24 Attorneys for Defendant  
25 FCA US LLC f/k/a Chrysler Group LLC

26 **UNITED STATES DISTRICT COURT**  
 27 **EASTERN DISTRICT OF CALIFORNIA**

28 SHAWN ALGER as an individual and on behalf of all others similarly situated,

Plaintiff,

v.

FCA US LLC f/k/a CHRYSLER GROUP LLC, a Delaware Corporation, and DOES 1 through 100, inclusive,

Defendants.

Case No.: 2:18-cv-00360-MCE-EFB

**AMENDED ADDENDUM TO  
 STIPULATED PROTECTIVE ORDER**

Assigned to Hon. Morrison C. England, Jr.  
 Courtroom 7, 14<sup>th</sup> Floor  
 Complaint Filed: February 16, 2018

1           WHEREAS, on July 25, 2018 the court entered a Protective Order in this case to protect  
2 from disclosure various documents produced by the Parties to this litigation;

3           WHEREAS, after the issuance of the Protective Order, plaintiff served third party subpoenas  
4 seeking documents and testimony from third parties;

5           WHEREAS, the Parties desire to allow confidential documents and testimony produced by  
6 such third parties to be protected from disclosure pursuant to the Protective Order entered int his  
7 case.

8           IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD, that Section 2.7 of the  
9 Protective Order is hereby amended to read as follows: “Party: any party to this action, or any third  
10 party producing documents or deposition testimony in response to a subpoena served in this action,  
11 including all of its officer, directors, employees, consultants, retained experts, and Counsel (and  
12 their support staffs).”

13           IT IS FURTHER STIPULATED, THROUGH COUNSEL OF RECORD, that Section 7.2(f)  
14 of the Protective Order is hereby amended to read as follows: any actual or anticipated witnesses in  
15 the action to whom disclosure is reasonably necessary and who have signed the “Acknowledgment  
16 and Agreement to Be Bound” (Exhibit A), and their Counsel, unless otherwise agreed by the  
17 Designating Part or ordered by the court. Pages of transcribed deposition testimony or exhibits to  
18 depositions that reveal Protected Material must be separately bound by the court reporter and may  
19 not be disclosed to anyone except as permitted under this Stipulated Protective Order.

20  
21 Dated: October 23, 2018.

Respectfully submitted,

22 KERSHAW, COOK & TALLEY PC

23 By: /s/Stuart C. Talley

24 STUART C. TALLEY

25 WILLIAM A. KERSHAW

26 IAN J. BARLOW

Attorneys for Plaintiff and the putative Class

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Dated: October 23, 2018.

DYKEMA GOSSETT LLP

By: /s/ Fred J. Fresard  
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Attorneys for Defendant  
FCA US LLC f/k/a/ Chrysler Group LLC

[~~PROPOSED~~] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: October 25, 2018.

  
EDMUND F. BRENNAN  
UNITED STATES MAGISTRATE JUDGE