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6 Attorneys for Defendant
 PHILIPPINE AIRLINES, INC.

7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

11 LEONILA M. JAVIER AND PEDRO)
 12 JAVIER,)

Case No. CV 09-03398 JSW

13 Plaintiffs,

**STIPULATION FOR
 PROTECTIVE ORDER AND
~~PROPOSED~~ ORDER THEREON**

14 vs.

15 PHILIPPINE AIRLINES, INC.,

16 Defendant.
 17

18 Plaintiffs Leonila M. Javier and Pedro Javier, and defendant Philippine
 19 Airlines, Inc. (hereinafter "Philippine Airlines"), by and through their respective
 20 attorneys of record, stipulate as follows:

21
 22 Recitals

23 Whereas, Plaintiffs have requested that Philippine Airlines produce a copy
 24 of the passenger manifest for PAL flight PR107 on October 14-15, 2008 (the
 25 "Passenger Manifest");

26 Whereas, 14 C.F.R. Part 243 prohibits the use or dissemination of passenger
 27 manifests and contact information for commercial or marketing purposes and
 28 prohibits the release of passengers lists and contact information to anyone other

1 than the United States State Department, the National Transportation Safety Board
2 and the United States Department of Transportation.

3
4 Stipulation

5 Plaintiffs shall not disseminate, transmit or provide access to the Passenger
6 Manifest other than to plaintiffs' attorneys at Brent & Fiol, LLP, the staff
7 employed by Brent & Fiol, LLP, and any experts, agents or independent
8 contractors retained by plaintiffs and/or their attorneys, Brent & Fiol, LLP, for the
9 purposes of the litigation in the above-reference action;

10 Use of the Passenger Manifest by plaintiffs, plaintiffs' attorneys at Brent &
11 Fiol, LLP, the staff employed by Brent & Fiol, LLP, and any experts, agents or
12 independent contractors retained by plaintiffs and/or their attorneys, Brent & Fiol,
13 LLP, shall be permitted only for purposes of the litigation in the above-referenced
14 action;

15 Upon a resolution of the above-referenced action either in judgment,
16 dismissal, or settlement, plaintiffs, their attorneys, Brent & Fiol, LLP, and any
17 experts, agents or independent contractors retained by plaintiffs and/or their
18 attorneys, Brent & Fiol, LLP, shall immediately destroy the Passenger Manifest
19 and all copies or reproductions of the Passenger Manifest;


20 Upon the destruction of the Passenger Manifest, plaintiffs' attorneys at Brent
21 & Fiol, LLP shall confirm in writing to Philippine Airlines, through its attorneys at
22 Condon & Forsyth, LLP, 1901 Avenue of the Stars, Suite 850, Los Angeles,
23 California 90067-6010, that the Passenger Manifest and all copies or reproductions
24 of the Passenger Manifest have been destroyed.

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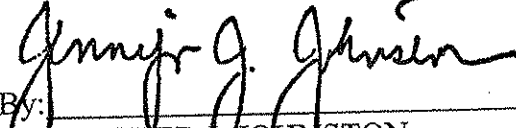
1 Dated: February 10, 2010

BRENT & FIOL, LLP

By: 
DAVID L. FIOL
Attorneys for Plaintiffs
LEONILA M. JAVIER and PEDRO
JAVIER

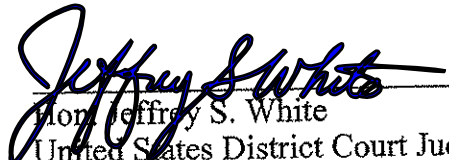
7 Dated: February 10, 2010

CONDON & FORSYTH LLP

By: 
JENNIFER J. JOHNSTON
JULIA K. DOYLE
Attorneys for Defendant
PHILIPPINE AIRLINES, INC.

14 Good Cause Appearing, IT IS SO ORDERED.

18 DATED: February 12, 2010


Hon. Jeffrey S. White
United States District Court Judge