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Attorney for Defendant OFFICER DEBORAH TRUJILLO

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA

11 KATHY LEE,

12 Plaintiff,

13 vs.

14 CITY OF SAN LEANDRO, IAN R. WILLIS,
 15 in his official capacity as Chief of Police in San
 16 Leandro, OFFICER DEBORAH TRUJILLO
 17 (#297), individually and in her official capacity,
 18 SAN LEANDRO POLICE DEPARTMENT,
 19 DETECTIVE GOODMAN (#282), individually
 20 and in his official capacity, DETECTIVE
 21 RAMSEY (#307), individually and in his
 22 official capacity, OFFICE L. BRANDT
 23 (#273), individually and in his official capacity,
 24 OFFICER GUILLEN (#291), individually and
 25 in his official capacity, DET. SGT. DeCOSTA
 26 (#243), individually and in his official capacity,
 27 and DOES 1-40,

28 Defendants.

) Case No.: C 10-00104 MMC

) **STIPULATION AND ORDER RE: MOTION**
) **FOR ADMINISTRATIVE RELIEF FOR**
) **FILING OF DECLARATION OF**
) **DEFENDANT DEBORAH TRUJILLO**
) **UNDER SEAL IN SUPPORT OF MOTION**
) **FOR SUMMARY JUDGMENT OR,**
) **ALTERNATIVELY, FOR SUMMARY**
) **ADJUDICATION OF ISSUES [LOCAL**
) **RULES 7-11, 7-12 and 79-5] ; DIRECTIONS TO**
) **DEFENDANT TRUJILLO**

First Amended Complaint Filed: April 5, 2010

29 The parties hereby stipulate as follows:

30 Defendant Deborah Trujillo (“defendant Trujillo”), individually and in her official capacity, intends
 31 to file a Motion for Summary Judgment or, alternatively, for Summary Adjudication of Issues on April 29,
 32 2011 in the above-captioned matter;

STIPULATION FOR FILING DECLARATION OF DEF. TRUJILLO UNDER SEAL

1 Defendant Trujillo intends to file a Declaration in Support of her Motion for Summary Judgment or,
2 Alternatively, for Summary Adjudication of Issues, which will refer to and incorporate confidential
3 material; specifically, an Affidavit for Warrant containing the identities of juveniles and victims of crimes
4 and Search Warrant. Under the terms and conditions of a Stipulated Protective Order signed by the parties
5 and ordered by Magistrate Judge Laurel Beeler on April 12, 2011, the Affidavit for Warrant was provided
6 by counsel for Defendants City of San Leandro, Police Chief Ian R. Willis, Detective Goodman and Det.
7 Sgt. DeCosta to counsel for plaintiff and defendant Trujillo on or about April 13, 2011;

8 Defendant Trujillo will file, concurrently with her Motion for Summary Judgment or, Alternatively,
9 for Summary Adjudication of Issues, an accompanying Motion for Administrative Relief as required under
10 Civil Local Rules 7-11 and 79-5 (b), seeking an order for the filing of her Declaration under seal in support
11 of her Motion for Summary Judgment or, Alternatively, for Summary Adjudication of Issues;

12 Based on the confidentiality of information contained in the Affidavit for Warrant, that the Affidavit
13 for Warrant was provided to all parties and counsel only after the Court signed a Stipulated Protective
14 Order, the parties now stipulate as follows:

15 IT IS HEREBY STIPULATED by and between the parties to the above-captioned matter that the
16 Declaration of Deborah Trujillo and attached exhibits in support of her Summary Judgment or,
17 Alternatively, for Summary Adjudication of Issues shall be filed under seal in accordance with Civil Local
18 Rules 7-11 and 79-5 (b).

19 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

20 DATED: April 26, 2011.

21 Respectfully submitted,

22 LAW OFFICES OF STEPHEN M. FUERCH
23 A Professional Corporation

24 By: 

25 STEPHEN M. FUERCH

26 Attorneys for Defendant DEBORAH TRUJILLO

1 DATED: April 26, 2011.

MEYERS, NAVE, RIBACK, SILVER & WILSON

2
3 By: 

4 MATTHEW A. LAVRINETS
5 Attorneys for Defendants CITY OF SAN LEANDRO,
6 POLICE CHIEF IAN R. WILLIS, DETECTIVE NEIL
7 GOODMAN, and SGT. RICK DeCOSTA

8 DATED: April 28, 2011.

LAW OFFICE OF RUSSELL A. ROBINSON

9
10 By: /s/

11 RUSSELL A. ROBINSON
12 Attorney for Plaintiff KATHY LEE

13
14 PURSUANT TO STIPULATION, IT IS SO ORDERED. Further, Trujillo is directed to file
15 under seal the above-referenced declaration and exhibits attached thereto. See General Order
16 No. 62 (providing if motion to seal is granted, "requesting party will e-file the document under

DATED: ~~April~~ May 3, 2011.

seal").

May 3, 2011

17
18 
19 Hon. Maxine M. Chesney
20 United States District Judge