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

11 ABDUL ALANI,

12 Plaintiff,

13 v.

14 ALASKA AIRLINES, INC.; CORPORATE
 15 DOES 1-20; and INDIVIDUAL DOES 21-40,
 16 inclusive,

17 Defendants.

Case No. CV-10-2766 WHA

**~~PROPOSED~~ ORDER COMPELLING
 PRODUCTION OF DOCUMENTS BY
 DEFENDANT ALASKA AIRLINES, INC.**

1 Plaintiff Abdul Alani's Second Request for Production of Documents sought production
2 of, *inter alia*, reports submitted to Defendant by any Alaska Airlines technician under the terms
3 of the "Aviation Safety Action Program" ("ASAP") during the period January 1, 2000, to date.
4 Defendant objected and declined to produce the documents on the grounds that Alaska Airlines
5 does not have the unilateral right to produce the ASAP documents, that they are neither relevant
6 nor likely to lead to the discovery of admissible evidence regarding Plaintiff's national origin and
7 retaliation claims, and that production of the documents would chill ASAP reporting by
8 employees.

9
10 The parties met and conferred, as a consequence of which Plaintiff narrowed his request
11 to ASAP reports submitted to Defendant by avionics technicians in the specified period, with the
12 technicians' names redacted and replaced by a numeric code. Defendant responded that its
13 objections remained and declined to produce the requested documents.

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15 Plaintiff sought an order compelling Defendant to produce ASAP reports submitted to it
16 by avionics technicians. Plaintiff submitted to the Court a letter brief dated September 20, 2011,
17 summarizing the relief sought, pursuant to the Supplemental Order to Order Setting Initial Case
18 Management Conference in Civil Cases Before Judge William Alsup. Defendant submitted to the
19 Court a letter brief in opposition dated September 23, 2011. This matter came on for hearing
20 before the Honorable William H. Alsup on September 26, 2011, at 2:00 p.m., Deborah C.
21 England, Esq., appearing for Plaintiff and Angela M. Corridan, Esq., of Davis Wright Tremaine,
22 LLP, appearing for Defendant.

23
24 The Court, having considered the pleadings and papers filed in support and opposition to
25 Plaintiff's request for relief, the other pleadings and papers on file in this matter, as well as the
26 arguments of counsel, now orders as follows: Defendant is ordered to produce ASAP reports
27 submitted by technicians employed by Defendant at either San Francisco International Airport or
28

1 Oakland International Airport, who have submitted three or more ASAP reports, whether
2 accepted or rejected by the ASAP committee, during the period January 1, 2007, through August
3 31, 2008. The name of a technician submitting any ASAP report to be produced shall be
4 redacted and replaced by a unique numeric code assigned to the individual technician. The
5 redacted documents may be produced by Defendant subject to the stipulated Protective Order
6 entered in this action.
7

8 The documents to be produced shall be served on Plaintiff's counsel not later than
9 October 11, 2011. Defendant shall have one week from the date of the hearing of this matter to
10 submit a letter on behalf of the Federal Aviation Administration ("FAA") and/or the Aircraft
11 Mechanics Fraternal Organization ("AMFA"), respectively, if either entity objects to the
12 disclosure of the redacted documents, requesting to be heard to object to this Order.
13

14 SO ORDERED.

15
16 Dated: September 29, 2011.



17 _____
18 William Alsup
19 UNITED STATES DISTRICT JUDGE

20 Approved as to form.

21
22 Dated: September 28, 2011

23 DAVIS WRIGHT TREMAINE, LLP

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25 By: /s/ Angela M. Corridan
26 ANGELA M. CORRIDAN
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ATTESTATION PURSUANT TO GENERAL ORDER 45

I, Deborah C. England, attest that I obtained the concurrence of Angela M. Corridan, in filing this document.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed this 28th day of September, 2011, at San Francisco, California.

/s/ Deborah C. England
Deborah C. England