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CAMBRIAN SCHOOL DISTRICT,
FAMMATRE ELEMENTARY SCHOOL,
7 KRISTI SCHWIEBERT, RANDY
SCOFIELD, and DEBORAH BLOW
8

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 J.C., by and through his mother and
14 guardian ad litem, W.P., and W.P.
individually,

15 Plaintiffs,

16 vs.

17 CAMBRIAN SCHOOL DISTRICT,
18 FAMMATRE CHARTER
ELEMENTARY SCHOOL, KRISTI
19 SCHWIEBERT, RANDY SCOFIELD,
DEBORAH BLOW, and DOES 1 thru
20 20, inclusive,

21 Defendants.
22

No. CV12-03513 EMC

**STIPULATION FOR PROTECTIVE ORDER
PROTECTING PRIVACY RIGHTS OF
MINORS**

JUDGE: Edward M. Chen

COMPLAINT FILED: 7/6/2012

23 I. RECITALS
24

25 The Parties and the Court are mindful of the fact that the conduct of pre-trial litigation, pre-
26 trial discovery and the trial of this action may involve disclosure of information that may impact the
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1 privacy rights of the minors involved in the underlying events giving rise to this Action. Therefore,
2 the parties hereby stipulate as follows:

3 **II. PROTECTIVE ORDER**

4 A. All documents filed with the Court or other information including deposition testimony
5 or other discovery obtained in conjunction with this action, or in any related action, shall be deemed
6 confidential and subject to this protective order.
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8 B. Any document filed with the Court which refers to a minor involved in the underlying
9 events giving rise to this Action shall not use the full name of that minor but rather shall refer to that
10 minor by his or her first initial only. In the event where more than one minor shares the same first
11 initial, the minors sharing the same initial shall be designated by his or her first initial and a
12 chronological number. For example, if minors Alex and Aaron are involved, Alex would be A-1
13 and Aaron would be A-2.
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15 C. The parties shall lodge (not file) with the Court a document containing the full name of
16 the minor who was referred to in court filed documents by initial only. This lodged document shall
17 refer to the minor by both full name and initial so the Court can easily identify the minor referred to
18 in the publicly filed documents.

19 D. The documents, information, and designated deposition testimony generated in this
20 Action shall be used by the person to whom it is disclosed solely for the purpose of this action, the
21 recipient shall not disseminate the information to anyone other than the client, members of the law
22 firm representing the client, and any expert retained to testify in this lawsuit except pursuant to the
23 terms of this order, or otherwise, as the Court may direct. Said documents, information, and
24 designated deposition testimony actually generated in this action shall not be used for any business
25 or other purpose separate from this lawsuit unless agreed to in writing by all parties to this action, or
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1 as authorized by further order of the Court.

2 E. This order may be modified by further order of this Court or by agreement by the
3 parties through their counsel or as self represented parties, subject to the approval of the Court,
4 provided that any such agreement shall be memorialized in the form of a stipulation that is filed with
5 the clerk and made part of the record in this case.
6


7 DATED: 4/19/13

LAW OFFICES OF DAVID TOLLNER

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10 Bv 
11 DAVID TOLLNER
12 Attorney for Plaintiff Jacob C.

13 DATED: 4-19-13

14 DAVIS & YOUNG, APLC

15
16 Bv 
17 MARK E. DAVIS
18 Attorneys for Defendants
19 CAMBRIAN SCHOOL DISTRICT,
20 FAMMATRE ELEMENTARY
21 SCHOOL, KRISTI SCHWIEBERT,
22 RANDY SCOFIELD, and DEBORAH
23 BLOW

22 Pursuant to stipulation, IT IS SO ORDERED.

23 April 23, 2013

24 DATED: _____

25 EDWARD
26 United Sta

