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4	Telephone Number: (408) 294-6100 Facsimile Number: (408) 294-6190	
5	Email Address: fred.schwinn@sjconsumerlaw.com	n
6	Attorneys for Plaintiff WILLIAM BENTKOWSKY	
7		
8		ATES DISTRICT COURT
9		DISTRICT OF CALIFORNIA ISCO DIVISION
10	WILLIAM BENTKOWSKY,	Case No. 3:13-CV-01252-VC-JCS
11	Plaintiff,	
12	V.	STIPULATION AND [PROPOSED] ORDER RE FILING CERTAIN
13	BENCHMARK RECOVERY, INC., a	DOCUMENTS UNDER SEAL
14	Washington corporation, and JEFFREY J. LASNIER, individually and in his official	
15	capacity,	
16	Defendants.	
17	The parties, having met and conferred on	the issue consistent with the terms of the Protective
18 19	Order for Litigation Involving Confidential Information and Trade Secrets (Doc. 73) entered in this	
20	action on July 30, 2014, hereby stipulate and agree that, pursuant to Civil Local Rule 7-11 and Civil	
21	Local Rule 79-5(d), either party may file the	following document under seal so that it may be
22	considered by the court in connection with the mo	tions for summary judgment in this action:
23	1. Document titled "Colle	ction Agency Agreement," Bates-numbered
24	BENTKOWSKY-BRI000164 to BENTKOWSKY	-BRI000168, inclusive.
25	By so stipulating Plaintiff does not agree	that the document qualifies for protection under the
26		
27	Protective Order, and has only agreed that it may be filed under seal so that the Court can determine	
28	whether it qualifies for protection.	
		ΓΑΙΝ DOCUMENTS UNDER SEAL

Case No. 3:13-CV-01252-VC-JCS

1	IT IS SO STIPULATED.	
2		CONSUMER LAW CENTER, INC.
3		
4	Dated: <u>August 28, 2014</u>	By: <u>/s/ Fred W. Schwinn</u>
5		Fred W. Schwinn, Esq. Attorney for Plaintiff
6		WILLIAM BENTKOWSKY
7		UDONIOU MOQUOMITZ
8		KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
9		
10	Dated: <u>August 28, 2014</u>	By: <u>/s/ June D. Coleman</u>
11		June D. Coleman, Esq. Attorney for Defendants
12		BENCHMARK RECOVERY, INC., and JEFFREY J. LASNIER
13		
14	THE FOREGOING STIPULATION IS APPROVED AND IS SO ORDERED.	
15	IS ALL KOVED AND IS SO ONDERED.	
15 16		1/
	Dated: September 4, 2014	The Honorable Vince Chhabria
16		The Honorable Vince Chhabria United States District Judge
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