

1 WHEREAS Plaintiff Gena Hanson, individually and on behalf of others similarly situated, as a
2 part of the discovery process and in preparation for mediation, has requested that Defendant, JQD,
3 LLC, d/b/a/ Pro Solutions, (collectively, the “Parties”) produce its database of collection information
4 for all putative class members (hereafter the “Database”);

5 WHEREAS Defendant believes that the outstanding discovery requests are overbroad and call
6 for the production of confidential private information;

7 WHEREAS Plaintiff believes that the existing protective order, signed by the Court on
8 September 22, 2014, is sufficient to protect any privacy rights of the putative class members that may
9 be put at issue;

10 WHEREAS Defendant believes that the existing protective order signed by the Court on
11 September 22, 2014, is insufficient to protect the privacy rights of class members that may be put at
12 issue and it may be prohibited from producing the information plaintiff seeks without a court order;

13 WHEREAS Defendant is concerned about its limited insurance coverage and the fact that the
14 amount of coverage is reduced by the cost of the defense, and, therefore, desires to attempt to settle
15 this matter, and has proposed that the parties participate in a mediation,

16 WHEREAS Plaintiff has stated it cannot participate in a mediation without the information it
17 sought through discovery

18 NOW, THEREFORE, the Parties hereby STIPULATE that the Court enter a supplemental
19 protective order directing Defendant to provide the Database to Plaintiff, and order that (1) Plaintiff
20 shall treat the Database as “Attorney’s Eyes Only” information; (2) Plaintiff shall not contact any
21 putative class members prior to class certification or without the express permission of Defendant or
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1 the Court (this does not preclude Plaintiff from discussing the case with any putative class members
2 who affirmatively contact Plaintiff); (3) production of the information requested does not constitute a
3 wavier of any privilege which would otherwise apply; (4) Plaintiff shall not contact any Homeowner's
4 Association identified in the Database without the express permission of Defendant or the Court; and,
5 (5) within 30 days of the conclusion of the case Plaintiff will return to Pro Solutions' counsel all copies
6 of the database and destroy all copies of documents obtained from it.

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8 Respectfully submitted,
9 Dated: March 3, 2015

COTCHETT, PITRE & McCARTHY, LLP

10 By: /s/ Justin T. Berger

11 NIAL P. McCARTHY
12 ANNE MARIE MURPHY
13 JUSTIN T. BERGER
14 SHAUNA R. MADISON

15 **HOUSING AND ECONOMIC RIGHTS ADVOCATES**
16 NOAH ZINNER
17 GINA DI GIUSTO

Attorneys for Plaintiff and the Proposed Class

18 Dated: March 3, 2015

LEWIS BRISBOIS BISGAARD & SMITH LLP

19 By: /s/ Stephen H. Turner

20 STEPHEN H. TURNER


21 *Attorneys for Defendant JQD, LLC d/b/a*
22 *PRO SOLUTIONS*

~~PROPOSED~~ ORDER

Pursuant to the STIPULATION of the Parties, it is hereby ordered that Defendant shall provide the requested Database to Plaintiff, and that (1) Plaintiff shall treat the Database as “Attorney’s Eyes Only” information; (2) Plaintiff shall not contact any putative class members prior to class certification or without the express permission of Defendant or the Court (this does not preclude Plaintiff from discussing the case with any putative class members who affirmatively contact Plaintiff); (3) production of the information requested does not constitute a waiver of any privilege which would otherwise apply; (4) Plaintiff shall not contact any Homeowner’s Association identified in the Database without the express permission of Defendant or the Court; and, (5) within 30 days of the conclusion of the case Plaintiff will destroy the copy of the database and all copies of documents obtained from it.

IT IS SO ORDERED.

DATED: 3/4/2015



Honorable Richard Seeborg
Judge for the United States District Court