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8 *Attorneys for Defendants State of California,*
by and through its California Highway Patrol;
 9 *Commissioner Joseph A. Farrow;*
Officer Jose Ortega; and Officer Timothy J. Brown

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 CIVIL DIVISION

15 **ESTRELLA LYSANDRA ZAYAS,**
 16 Plaintiff,
 17 **v.**
 18 **STATE OF CALIFORNIA, ET AL,**
 19 Defendants.
 20

Case No. 3:17-cv-02739
**STIPULATION TO PROTECTIVE ORDER
 AND [Proposed] ORDER**
 Dept: 5
 Judge: The Honorable Edward M. Chen
 Trial Date: Not yet assigned
 Action Filed: May 11, 2017

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1 plaintiff or her representatives or agents, other than (a) the parties to this litigation; (b) the parties'
2 attorneys, paralegals, and legal office staff in this litigation; (c) the parties' expert consultants in
3 this litigation for purposes of expert consultation and trial testimony preparation; and (d) the court
4 in this action, filed under seal, for purposes of this litigation.

5 3. The plaintiff's expert consultants must sign an acknowledgment and agreement to be
6 bound by the terms of this Protective Order, an executed copy of which will be provided to
7 defendants' counsel within seven (7) days after formal disclosure of such consultants as expert
8 witnesses in this litigation. The acknowledgment and agreement must contain the following
9 language:

10 "As an expert witness for the plaintiffs in this lawsuit, I hereby acknowledge
11 receipt of a copy of the signed Stipulation to Protective Order, and Order, approved
12 and entered by the Court in this action, and I agree to be bound by all terms and
13 conditions in that Protective Order and recognize that I may be personally found in
contempt of Court or subject to other sanctions determined by the Court should I
violate any term or condition in that Protective Order."

14 4. All documents produced subject to this Stipulation and Protective Order and copies
15 thereof will be clearly marked "Confidential" to indicate that they are subject to this Protective
16 Order.

17 5. All documents produced subject to this Stipulation and Protective Order and copies
18 thereof must be returned to defendants' counsel upon the termination of this litigation.

19 6. This Protective Order does not in any way affect or prejudice the right of any party at
20 the time of trial or other proceedings in this action to object to the use or admissibility of said
21 documents at the trial or in other proceedings.

22 7. Any writings or other documents stipulated in writing by the parties to be confidential
23 and marked "Confidential," and produced prior to the date the Protective Order is signed by the
24 Court, shall also be subject to all terms of this Stipulation and Protective Order.

25 8. If any party intends to file a motion that includes as an exhibit any writing(s) subject
26 to this protective order, that party must file the writing(s) under seal pursuant to Northern District
27 Civil Local Rule 79-5.
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1 9. Violation of this Protective Order by any party or any other person, including but not
2 limited to any party's expert witnesses and consultants, will result in sanctions to be determined
3 by the Court upon application by any other party.

4 **SO STIPULATED:**

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6 Dated: August 10, 2017

LAW OFFICES OF PANOS LAGOS

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8 /s/Panos Lagos
9 Panos Lagos, Esq.
10 Attorney for Plaintiff,
11 ESTRELLA LYSANDRA ZAYAS

12 Dated: August 9, 2017

XAVIER BECERRA
Attorney General of California
JEFFREY R. VINCENT
Supervising Deputy Attorney General

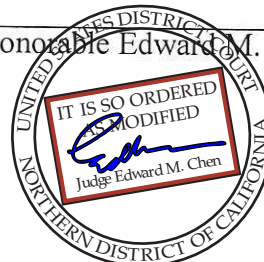
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15 *Kymerly E. Speer*
16 KYMBERLY E. SPEER
17 Deputy Attorney General
18 *Attorneys for Defendants State of*
19 *California, by and through its California*
20 *Highway Patrol; Commissioner Joseph A.*
21 *Farrow; Officer Jose Ortega; and Officer*
22 *Timothy J. Brown*

23 **ORDER**

24 So ordered. Parties shall show cause why CHP training materials
25 must remain confidential. Parties to file briefing

26 Dated: August 14, 2017 by 8/21/17.

27 Honorable Edward M. Chen



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