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 City Attorney
 2 JENNIFER E. CHOI, State Bar #184058
 Chief Trial Deputy
 3 SABRINA M. BERDUX, State Bar #248927
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10 Attorneys for Defendants
 11 CITY AND COUNTY OF SAN FRANCISCO; WILLIAM SCOTT;
 THOMAS HARVEY; and MATT SULLIVAN

12
 13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA

15 J.T., through her father and guardian SAMER
 TAWASHA; L.R., through her mother and
 16 guardian GWEN LEE; C.L., through her
 mother and guardian NAOMI LOPEZ, ON
 17 BEHALF OF THEMSELVES AND ALL
 OTHERS SIMILARLY SITUATED,

18 Plaintiffs,

19 vs.

20 CITY AND COUNTY OF SAN
 21 FRANCISCO, WILLIAM SCOTT, THOMAS
 HARVEY, MATT SULLIVAN, and DOES 1-
 22 100,

23 Defendants.

24 R.P.,

25 Plaintiff,

26 vs.

27 CITY AND COUNTY OF SAN
 FRANCISCO,
 28 Defendant.

Case No. 23-cv-06524-LJC
 Case No. 24-cv-00522-LJC

**STIPULATION AUTHORIZING THE
 DISCLOSURE OF PLAINTIFFS' JUVENILE
 RECORDS AND ORDER REGARDING
 PRODUCTION OF INDIVIDUAL
 PLAINTIFFS' JUVENILE RECORDS**

Re: Dkt. No. 79 (23-cv-06524)
Re: Dkt. No. 45 (24-cv-00522)


Trial Date: Not Set

1 Pursuant to the August 14, 2024 Order regarding Discovery Letters (Dkt. No. 79) requiring
2 Plaintiffs to stipulate to the release and production of their Juvenile Records, Plaintiffs J.T., through
3 her father and guardian Samer Tawasha; L.R., through her mother and guardian Gwen Lee; C.L.,
4 through her mother and guardian Naomi Lopez, and Plaintiff R.P., through his guardian and mother,
5 Thidia Penia, along with all other guardians and parents, including attorneys of record (collectively,
6 “Plaintiffs”) and Defendants City and County of San Francisco, William Scott, Thomas Harvey, and
7 Matt Sullivan (collectively, “City Defendants”) stipulate as follows:
8

9 1. Plaintiffs expressly authorize the disclosure of their individual juvenile records,
10 including but not limited to the incident report, arrest record, and Body Worn Camera video of them,
11 in this litigation (collectively, the “Juvenile Records”). Plaintiffs waive, forfeit and relinquish any and
12 all rights or claims related to the mere production and disclosure of their Juvenile Records in this
13 litigation, under federal or state law, including under the California Welfare and Institutions Code,
14 Health and Safety Code, and California privacy laws.

15 2. Plaintiffs agree and stipulate that their Juvenile Records shall be designated as
16 “Confidential,” and not “Attorneys Eyes Only,” and will be used, filed and treated in this litigation in
17 accordance with the terms of the Protective Order. Plaintiffs waive all rights or claims that the records
18 will be shielded from production based on rights of privacy under federal law, the California
19 Constitution or California law, including, but not limited to, the Welfare and Institutions Code, Civil
20 Code, Penal Code and Health and Safety Code. Plaintiffs expressly waive and agree the City
21 Defendants are immunized from any and all liability, legal theory, relief and/or claim of any kind
22 related to the mere production of their Juvenile Records in this litigation.

23 Dated: August 22, 2024

24 
By: Samer Tawasha (Aug 26, 2024 19:00 PDT)
Samer Tawasha (J.T. guardian and parent)

26 Dated: August 22, 2024

27 By: _____
28 Anna Vega (J.T. guardian and parent)

1 Pursuant to the August 14, 2024 Order regarding Discovery Letters (Dkt. No. 79) requiring
2 Plaintiffs to stipulate to the release and production of their Juvenile Records, Plaintiffs J.T., through
3 her father and guardian Samer Tawasha; L.R., through her mother and guardian Gwen Lee; C.L.,
4 through her mother and guardian Naomi Lopez, and Plaintiff R.P., through his guardian and mother,
5 Thidia Penia, along with all other guardians and parents, including attorneys of record (collectively,
6 “Plaintiffs”) and Defendants City and County of San Francisco, William Scott, Thomas Harvey, and
7 Matt Sullivan (collectively, “City Defendants”) stipulate as follows:

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11 all rights or claims related to the mere production and disclosure of their Juvenile Records in this
12 litigation, under federal or state law, including under the California Welfare and Institutions Code,
13 Health and Safety Code, and California privacy laws.

14 2. Plaintiffs agree and stipulate that their Juvenile Records shall be designated as
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16 accordance with the terms of the Protective Order. Plaintiffs waive all rights or claims that the records
17 will be shielded from production based on rights of privacy under federal law, the California
18 Constitution or California law, including, but not limited to, the Welfare and Institutions Code, Civil
19 Code, Penal Code and Health and Safety Code. Plaintiffs expressly waive and agree the City
20 Defendants are immunized from any and all liability, legal theory, relief and/or claim of any kind
21 related to the mere production of their Juvenile Records in this litigation.


22
23 Dated: August 22, 2024

24 By: _____
25 Samer Tawasha (J.T. guardian and parent)

26 Dated: August 22, 2024

27 By:  _____
28 Anna Vega (J.T. guardian and parent)

1 Dated: August 22, 2024


By: Naomi Lopez (Aug 26, 2024 11:06 PDT)
Naomi Lopez (C.L. guardian and parent)

4 Dated: August 22, 2024

Fernando Lopez
By: Fernando Lopez (Aug 26, 2024 11:13 PDT)
Fernando Lopez (C.L. guardian and parent)


7 Dated: August 22, 2024

By: _____
Thidia Penia (R.P. guardian and parent)

10 Dated: August 22, 2024

By: _____
(R.P. guardian and parent)

13 Dated: August 22, 2024


By: Gwen Lee (Aug 26, 2024 12:43 PDT)
Gwen Lee (L.R. guardian and parent)

16 Dated: August 22, 2024

Rocco Rios
By: Rocco Rios (Aug 29, 2024 08:32 PDT)
Rocco Rios (L.R. guardian and parent)

19 Dated: August 22, 2024

DAVID CHIU
City Attorney
JENNIFER E. CHOI
Chief Trial Deputy
SABRINA M. BERDUX
MARGARET S. SCHROEDER
ZUZANA S. IKELS
Deputy City Attorneys

By: _____
SABRINA M. BERDUX

Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO;
WILLIAM SCOTT; THOMAS HARVEY; and
MATT SULLIVAN

1 Dated: August 29, 2024

2 By: _____
3 Naomi Lopez (C.L. guardian and parent)


4 Dated: August 29, 2024

5 By: _____
6 (C.L. guardian and parent)

7 Dated: 8/29/2024

8 
9 By: ID JstA65dQQwf2fNyvrqZL19x3 _____
Thida Pernia (R.P. guardian and parent)

10 Dated: 8/30/2024

11 
12 By: ID gfdY1u3d5T8RHb4Y5GG8mNfS _____
(R.P. guardian and parent)

13 Dated: August 29, 2024

14 By: _____
15 Gwen Lee (L.R. guardian and parent)

16 Dated: August 29, 2024

17 By: _____
18 (L.R. guardian and parent)

19 Dated: August 29, 2024

20 DAVID CHIU
21 City Attorney
22 JENNIFER E. CHOI
23 Chief Trial Deputy
24 SABRINA M. BERDUX
25 MARGARET S. SCHROEDER
26 ZUZANA S. IKELS
27 Deputy City Attorneys

28 By: /s/ Sabrina M. Berdux
SABRINA M. BERDUX

Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO;
WILLIAM SCOTT; THOMAS HARVEY; and
MATT SULLIVAN

1 Dated: August 22, 2024

PARTNERSHIP FOR CIVIL JUSTICE FUND

2 By: /s/ Rachel Lederman

3 RACHEL LEDE RMAN
4 MARA VE RHEYDEN-HILLIA RD

5 Attorneys for Plaintiffs

6 J.T., through her father and guardian SAMER
7 TAWASHA; L.R., through her mother and guardian
8 GWEN LEE; C.L., through her mother and guardian
9 NAOMI LOPEZ, on behalf of themselves and all others
10 similarly situated

11 Dated: August 22, 2024

THE COMMUNITY LAW OFFICE

12 By: /s/ Gabriela M. Lopez

13 GABRIELA M. LOPEZ

14 Attorneys for Plaintiffs

15 J.T., through her father and guardian SAMER
16 TAWASHA; L.R., through her mother and guardian
17 GWEN LEE; C.L., through her mother and guardian
18 NAOMI LOPEZ, on behalf of themselves and all others
19 similarly situated

20 Dated: August 22, 2024

LAW OFFICE OF BOBBIE STEIN

21 By: /s/ Bobbie Stein

22 BOBBIE STEIN

23 Attorneys for Plaintiffs

24 J.T., through her father and guardian SAMER
25 TAWASHA; L.R., through her mother and guardian
26 GWEN LEE; C.L., through her mother and guardian
27 NAOMI LOPEZ, on behalf of themselves and all others
28 similarly situated

Dated: August 16, 2024

POINTER & BUELNA, LLP
LAWYERS FOR THE PEOPLE

By: /s/Ty Clarke

ADANTE D. POINTER
PATRICK M. BUELNA
TY CLARKE

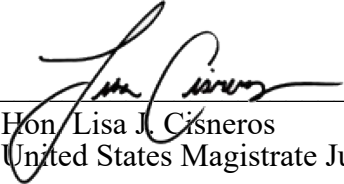
Attorneys for Plaintiff

R.P.

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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DATED: August 30, 2024



Hon. Lisa J. Cisneros
United States Magistrate Judge