1	DAVID CHIU, State Bar #189542	
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3	Chief Trial Deputy SABRINA M. BERDUX, State Bar #248927	14
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9	E-Mail: sabrina.m.berdux@sfcityatty.org deedee.schroeder@sfcityatty.org	
10	zuzana.ikels@sfcityatty.org	
11	Attorneys for Defendants CITY AND COUNTY OF SAN FRANCISCO; W	ZILLIAM SCOTT:
	THOMAS HARVEY; and MATT SULLIVAN	ILLIAM SCOTT,
12	I IN HATED, OT A TEL	I DIGEDICE COLUDE
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	Case No. 23-cv-06524-LJC Case No. 24-cv-00522-LJC
16	guardian GWEN LEE; C.L., through her mother and guardian NAOMI LOPEZ, ON	STIPULATION AUTHORIZING THE
17	BEHALF OF THEMSELVES AND ALL OTHERS SIMILARLY SITUATED,	DISCLOSURE OF PLAINTIFFS' JUVENILE RECORDS AND ORDER REGARDING
18	Plaintiffs,	PRODUCTION OF INDIVIDUAL PLAINTIFFS' JUVENILE RECORDS
19	vs.	
20	CITY AND COUNTY OF SAN	Re: Dkt. No. 79 (23-cv-06524) Re: Dkt. No. 45 (24-cv-00522)
21	FRANCISCO, WILLIAM SCOTT, THOMAS HARVEY, MATT SULLIVAN, and DOES 1-	Trial Date: Not Set
22	100,	Tital Date. Not Set
23	Defendants.	
24	R.P.,	
25	Plaintiff,	
26	vs.	
20	CITY AND COUNTY OF SAN FRANCISCO,	
28	Defendant.	
/.X		

Stipulation and Order re Juvenile Records Case No. 23-cv-06524-LJC and Case No. 24-cv-00522

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

- 1. Plaintiffs expressly authorize the disclosure of their individual juvenile records, including but not limited to the incident report, arrest record, and Body Worn Camera video of them, in this litigation (collectively, the "Juvenile Records"). Plaintiffs waive, forfeit and relinquish any and all rights or claims related to the mere production and disclosure of their Juvenile Records in this litigation, under federal or state law, including under the California Welfare and Institutions Code, Health and Safety Code, and California privacy laws.
- 2. Plaintiffs agree and stipulate that their Juvenile Records shall be designated as "Confidential," and not "Attorneys Eyes Only," and will be used, filed and treated in this litigation in accordance with the terms of the Protective Order. Plaintiffs waive all rights or claims that the records will be shielded from production based on rights of privacy under federal law, the California Constitution or California law, including, but not limited to, the Welfare and Institutions Code, Civil Code, Penal Code and Health and Safety Code. Plaintiffs expressly waive and agree the City Defendants are immunized from any and all liability, legal theory, relief and/or claim of any kind related to the mere production of their Juvenile Records in this litigation.

Dated: August 22, 2024

By: Samer Tawasha (Aug 26, 2024 19:00 PDT)

Samer Tawasha (J.T. guardian and parent)

Dated: August 22, 2024

Anna Vega (J.T. guardian and parent)

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

- 1. Plaintiffs expressly authorize the disclosure of their individual juvenile records, including but not limited to the incident report, arrest record, and Body Worn Camera video of them, in this litigation (collectively, the "Juvenile Records"). Plaintiffs waive, forfeit and relinquish any and all rights or claims related to the mere production and disclosure of their Juvenile Records in this litigation, under federal or state law, including under the California Welfare and Institutions Code, Health and Safety Code, and California privacy laws.
- 2. Plaintiffs agree and stipulate that their Juvenile Records shall be designated as "Confidential," and not "Attorneys Eyes Only," and will be used, filed and treated in this litigation in accordance with the terms of the Protective Order. Plaintiffs waive all rights or claims that the records will be shielded from production based on rights of privacy under federal law, the California Constitution or California law, including, but not limited to, the Welfare and Institutions Code, Civil Code, Penal Code and Health and Safety Code. Plaintiffs expressly waive and agree the City Defendants are immunized from any and all liability, legal theory, relief and/or claim of any kind related to the mere production of their Juvenile Records in this litigation.

By:______Samer Tawasha (J.T. guardian and parent)

Dated: August 22, 2024

Dated: August 22, 2024

Anna Vega (J.T. guardian and parent)

- 1		
1	Dated: August 22, 2024	Mada
2		By: Naomi Lopez (Aug 26, 2024 11:06 PDT)
3		Naomi Lopez (C.L. guardian and parent)
4	Dated: August 22, 2024	Fernando Lopez
5		By: Fernando Lopez (Aug 26, 2024 11:13 PDT)
6		Fernando Lopez (C.L. guardian and parent)
7	Dated: August 22, 2024	
8		By:
9		Thidia Penia (R.P. guardian and parent)
10	Dated: August 22, 2024	
11		By:(R.P. guardian and parent)
12		(R.P. guardian and parent)
13	Dated: August 22, 2024	CO _m
14		By Gwen Lee (Aug 26, 2024 12:43 PDT)
15		Gwen Lee (L.R. guardian and parent)
16	Dated: August 22, 2024	Rocco Rios
17		By: Rocco Rios (Aug 29, 2024 08:32 PDT) Rocco Rios (L.R. guardian and parent)
18		
19	Dated: August 22, 2024	DAVID CHIU
20		City Attorney JENNIFER E. CHOI
21		Chief Trial Deputy SABRINA M. BERDUX
22		MARGARET S. SCHROEDER ZUZANA S. IKELS
23		Deputy City Attorneys
24		D.,,
25		By: SABRINA M. BERDUX
26		Attorneys for Defendants
27		CITY AND COUNTY OF SAN FRANCISCO; WILLIAM SCOTT; THOMAS HARVEY; and
28		MATT SULLIVAN

1	Dated: August 29, 2024	
2		By:
3		Naomi Lopez (C.L. guardian and parent)
4	Dated: August 29, 2024	
5		By:(C.L. guardian and parent)
6		(C.L. guardian and parent)
7	Dated: 8/29/2024	
8		By: ID JSIA65dQQw/2fNyvrqZL19x3 Thida Pernia (R.P. guardian and parent)
9		Thida Pernia (R.P. guardian and parent)
10	Dated: 8/30/2024	
11		By: ID grdY1u3dsT8RHb4Y5GG8mN/S
12		(Ř.P. guardian and parent)
13	Dated: August 29, 2024	
14		By: Gwen Lee (L.R. guardian and parent)
15	Datad: August 20, 2024	Gwen Lee (L.R. guardian and parent)
16	Dated: August 29, 2024	D
17		By:(L.R. guardian and parent)
18	Datade Assessed 20, 2024	
19	Dated: August 29, 2024	DAVID CHIU
20		City Attorney JENNIFER E. CHOI
21		Chief Trial Deputy SABRINA M. BERDUX
22		MARGARET S. SCHROEDER ZUZANA S. IKELS
23		Deputy City Attorneys
24	B	By:/s/ Sabrina M. Berdux
25		SABRINA M. BERDUX
26 27		Attorneys for Defendants CITY AND COUNTY OF SAN FRANCISCO;
28		WILLIAM SCOTT; THOMAS HARVEY; and MATT SULLIVAN
40		

3

1	Dated: August 22, 2024	PARTNERSHIP FOR CIVIL JUSTICE FUND
2		By: /s/ Rachel Lederman
3		RACHEL LEDE RMAN MARA VE RHEYDEN-HILLIA RD
4		Attorneys for Plainti fs
5		•
6 7		J.T., through her father and guardian SAMER TAWAS HA; L.R., through her mother and guardian GWEN LEE; C.L., through her mother and guardian NAOMI LOPEZ, on behalf of themselves and all others similarly situated
8	Dated: August 22, 2024	THE COMMUNITY LAW OFFICE
9		222 00111122111 011102
	8)	By:/s/ Gabriela M. Lopez
10		GAB RIELA M. LOPEZ
11		Attorneys for Plaintiffs J.T., through her father and guardian SAMER
12		TAWASHA; L.R., t hough her mother and guardian
13		GWEN LEE; C.L., through her mother and guardian NAOMI LOPEZ, on behalf of themselves and all others
14	D . 1 . 4	similarly situated
15	Dated: August 22, 2024	LAW OFFICE OF BOBBIE STEIN
16	*	By: <u>/s/ Bobbie Stein</u>
17		BOBBIE STEIN
18		Attorneys for Plaintiffs J.T., through her father and guardian SAMER
19		TAWAS HA; L.R., through her mother and guardian GWEN LEE; C.L., through her mother and guardian
20		NAOMI LOPEZ, on behalf of themselves and all others
21		similarly situated
22	Dated: August 16, 2024	POINTER & BUELNA, LLP LAWYERS FOR THE PEOPLE
23		
24		By: /s/Ty Clarke
25		ADANTE D. POINTER PAT RICK M. BUELNA
		TY CLARKE
26		Attorneys for Plaintiff
27		R.P.
28		

PURSUANT TO STIPULATION, IT IS SO ORDERED. DATED: <u>August</u> 30, 2024 Hon/Lisa J. Cisneros United States Magistrate Judge