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Attorneys for Plaintiff
KIMBERLEY ROSS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KIMBERLEY ROSS,)
)
 Plaintiff,)
)
 v.)
)
 GLOBAL WINE COMPANY and JOHN)
 DAVIS,)
)
 Defendants.)

Case No.: CV09-06107 CW [ECF]
Case filed: 12/31/09
Trial date: 05/31/11

PROTECTIVE ORDER RE MEDICAL RECORDS

1 The parties hereto hereby stipulate that Plaintiff's mental health records will be treated
2 with utmost confidentiality. They will be considered "Attorneys Eyes Only," meaning they will
3 be shown only to the parties' attorneys and medical experts retained by said attorneys. This
4 applies to summaries and other recitations of the contents of the mental health records.

5 This agreement can be modified by the agreement of the parties or by Order of the Court.

6 Respectfully submitted,

7 Dated: _____

LAW OFFICE OF RICHARD M. ROGERS

9 By: _____
10 RICHARD M. ROGERS
Attorneys for Plaintiff

11 Dated: _____

MANNING & KASS ELLROD,
RAMIEREZ, TRESTER

14 By: _____
15 MADONNA HERMAN
Attorneys for Defendants

17 IT IS SO ORDERED.

19 Dated: 3/3/2011

20 By: 
21 JUDGE OF THE U.S. DISTRICT COURT