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13 Attorneys for Defendant
 14 UNITED STATES OF AMERICA

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17 OAKLAND DIVISION
 18

19 YUEN HAN LI and JUDY YUEN LI d.b.a.)
 20 GOLDEN WELL,)
 21 Plaintiff,)
 22 v.)
 23 UNITED STATES OF AMERICA,)
 24 Defendant.)

No. C 10-02488 LB
**STIPULATION AND ~~PROPOSED~~
 PROTECTIVE ORDER RE:
 ADMINISTRATIVE RECORD**

25 Subject to the approval of this Court, the parties hereby stipulate to the following
 26 protective order:

27 The parties agree that entry of the following protective order is necessary in order to
 28 protect the personal information of Supplemental Nutrition Assistance Program recipients,

1 including but not limited to their names, home addresses and social security numbers. The
2 parties therefore request that the Court enter the following stipulated protective order.

3 **STIPULATED PROTECTIVE ORDER**

4 The Administrative Record (A.R. 1 - A.R. 401) produced by defendant in this action shall
5 be subject to the following restrictions:

6 1. All information therein shall be used only for the purpose of this litigation and not
7 for any other purpose;

8 2. No information therein shall be disclosed to anyone other than (a) the attorneys
9 employed by plaintiff and its staff; (b) the parties; (c) actual or potential third-party witnesses; (d)
10 outside experts or consultants retained by any of the parties or their counsel for purposes of this
11 litigation; (e) the Court in further proceedings herein; (f) stenographic deposition reporters; and
12 (g) other persons upon whom the parties mutually agree in writing;

13 3. There shall be no reproduction of the Administrative Record documents except
14 that, as required by the litigation, copies, excerpts, or summaries may be shown to those
15 authorized in Paragraph 2;


16 4. Except as otherwise provided in Paragraphs 2 and 3, all Administrative Record
17 documents produced to plaintiffs shall remain in the custody of plaintiffs' attorneys of record
18 during the pendency of the litigation;

19 5. No later than thirty (30) days after final determination of this litigation, including
20 any appeals, plaintiffs' attorneys shall destroy or return to defendant's counsel all Administrative
21 Record documents produced to plaintiffs, including any copies, extracts or summaries thereof. If
22 the Administrative Record documents are destroyed, plaintiffs' attorneys shall so notify
23 defendant's counsel in writing within seven (7) days of the destruction. Notwithstanding this
24 paragraph, however, plaintiffs' attorneys may retain one copy of each pleading and other
25 document filed with the Court that contains any Administrative Record document; and

26 6. This Stipulation and Protective Order is without prejudice to the right of any party
27 to seek modification of it from the Court. It shall remain in effect until such time as it is
28 modified, amended or rescinded by the Court and shall survive termination of this action. The


1 Court shall have continuing jurisdiction to modify, amend, rescind or enforce this Stipulation and
2 Protective Order notwithstanding the termination of this action.

3
4 DATED: 12/2/10

By: 
KELLY T. SMITH
JOSE F. VERGARA
Attorneys for Plaintiffs

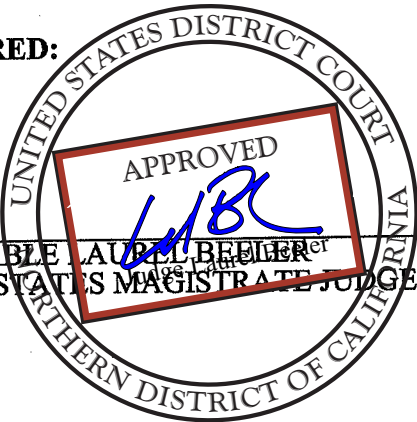
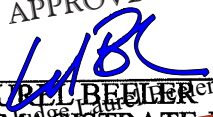
MELINDA L. HAAG
United States Attorney

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10 DATED: 12/3/10

By: 
NEILL T. TSENG
Assistant United States Attorney
Attorneys for Defendant

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14 PURSUANT TO STIPULATION, IT IS SO ORDERED:

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17 DATED: 12/6/10


APPROVED

HONORABLE LAUREL BEELER
United States Magistrate Judge