

LAW OFFICES OF PANOS LAGOS  
Panos Lagos, Esq. / SBN 61821  
5032 Woodminster Lane  
Oakland, CA 94602  
(510)530-4078  
(510)530-4725/FAX  
panoslagos@aol.com

Attorney for Plaintiff,  
HILARIO MARTINEZ

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

HILARIO MARTINEZ,  
  
Plaintiff,  
  
v.

Case No.: C11-01017 SBA (LB)  
  
STIPULATED PROTECTIVE  
ORDER

CITY OF PITTSBURG;  
CITY OF PITTSBURG POLICE DEPARTMENT;  
DANIEL BUCK, individually and as an Officer of  
the CITY OF PITTSBURG POLICE  
DEPARTMENT (Badge #293);  
CHUNLIAM SAECHAO, individually and as an  
Officer of the CITY OF PITTSBURG POLICE  
DEPARTMENT (Badge #288);  
RYAN WILKIE, individually and as an Officer of  
the CITY OF PITTSBURG POLICE  
DEPARTMENT (Badge #265);  
BRIAN SCOTT, individually and as an Officer of  
the CITY OF PITTSBURG POLICE  
DEPARTMENT (Badge #292); and  
DOES 1 – 100, inclusive,  
  
Defendants.

It is hereby agreed by and between the Office of the District Attorney of Contra Costa  
County by and through Counsel, Brian Michael Feinberg, Deputy District Attorney, and  
Plaintiff, Hilario Martinez, by and through Counsel, Panos Lagos, that the documents sought  
pursuant to Plaintiff's Subpoena Duces Tecum for the production of documents and things  
constituting the entire District Attorney file in *People v. Hilario Martinez*, Contra Costa County  
Case No.: 162025-1, served upon the Office of the District Attorney of Contra Costa County on

1 July 27, 2011, is subject to the following Protective Order:

- 2 1. The confidential information shall be used only in the above-captioned matter;
- 3 2. The confidential information produced can be shared with:
  - 4 a. Plaintiff;
  - 5 b. Plaintiff's counsel, and any counsel associated with Plaintiff's counsel, and who
  - 6 have signed the "Acknowledgment and Agreement to be Bound" (Exhibit A);
  - 7 c. Defendants' counsel and their clients ("Defendants" herein) and who have signed
  - 8 the "Acknowledgment and Agreement to be Bound" (Exhibit A);
  - 9 d. Experts of either Plaintiff or Defendants to whom the disclosure is reasonably
  - 10 necessary for this litigation and who have signed the "Acknowledgment and
  - 11 Agreement to be Bound" (Exhibit A);
  - 12 e. The Court and its personnel, court reporters and their staff, professional jury or
  - 13 trial consultants, mock jurors, and professional vendors to whom disclosure is
  - 14 reasonably necessary for this litigation and who have signed the
  - 15 "Acknowledgment and Agreement to be Bound" (Exhibit A);
  - 16 f. Witnesses in the action, during their depositions, to whom disclosure is
  - 17 reasonably necessary and who have signed the "Acknowledgment and Agreement
  - 18 to be Bound" (Exhibit A);
  - 19 g. The author or recipient of a document containing the information or a custodian
  - 20 or other person who otherwise possessed or knew the information;
  - 21 h. For trial.

22 Pages of transcribed deposition testimony or exhibits to depositions that reveal  
23 protected material must be separately bound by the court reporter and may not be  
24 disclosed to anyone except as permitted under this Stipulated Protective Order.

- 25 3. Plaintiff shall maintain the confidential information in his custody, control and
- 26 access.

27 ///

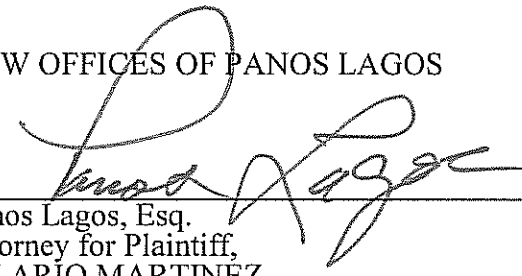
28 ///

- 1 4. The confidential information shall not be stored in any type of document or  
2 information retrieval system, database, or any format of compilation for such  
3 information.  
4 5. The confidential information shall be destroyed upon completion of the above-  
5 captioned matter.  
6

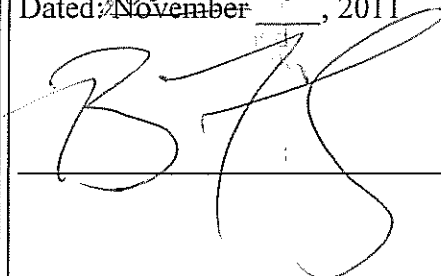
7 IT IS SO STIPULATED, THROUGH COUNSEL AS AFORE DESCRIBED.

8 December 2  
9 Dated: November, 2011

LAW OFFICES OF PANOS LAGOS

10   
11 Panos Lagos, Esq.  
12 Attorney for Plaintiff,  
13 HILARIO MARTINEZ

14 December 2  
15 Dated: November, 2011

16   
17 Office of the District Attorney,  
18 County of Contra Costa County

19 By: Brian Michael Feinberg  
20 Deputy District Attorney

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22 Dated: December 21, 2011

23   
24 LACREL BEELER  
25 United States Magistrate Judge  
26  
27  
28

1 EXHIBIT A

2 ACKNOWLEDGEMENT AND AGREEMENT TO BE BOUND

3 I, \_\_\_\_\_ [print or type full name],  
4 of \_\_\_\_\_  
5 [print or type full address], declare under penalty of perjury that I have read in its entirety and  
6 understand the Stipulated Protective Order that was issued by the United States District Court for  
7 the Northern District of California on \_\_\_\_\_ [date of order] in the case of  
8 *Martinez v. City of Pittsburg, et al.*, Case No.: C11-01017 SBA. I agree to comply with and to be  
9 bound by all the terms of this Stipulated Protective Order and I understand and acknowledge that  
10 failure to so comply could expose me to sanctions and punishment in the nature of contempt. I  
11 solemnly promise that I will not disclose in any manner any information or item that is subject to  
12 this Stipulated Protective Order to any person or entity except in strict compliance with the  
13 provisions of this Order.

14 I further agree to submit to the jurisdiction of the United States District Court for the  
15 Northern District of California for the purpose of enforcing the terms of this Stipulated Protective  
16 Order, even if such enforcement proceedings occur after termination of this action.

17 I hereby appoint \_\_\_\_\_  
18 [print or type full name] of \_\_\_\_\_  
19 [print or type full address and telephone number] as my California agent for service of process in  
20 connection with this action or any proceedings related to enforcement of this Stipulated  
21 Protective Order.

22  
23 Date: \_\_\_\_\_

24 City and State where sworn and signed: \_\_\_\_\_

25 Printed name: \_\_\_\_\_  
26 [printed name]

27 Signature: \_\_\_\_\_  
28 [signature]