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7 Attorneys for Defendants WATTS REGULATOR CO.,
 8 WATTS WATER TECHNOLOGIES, INC. and
 WOLVERINE BRASS, INC.

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 OAKLAND COURTHOUSE

13 JASON TRABAKOOLAS and SHEILA
 14 STETSON, individually and on behalf of all
 others similarly situated,

15 Plaintiffs,

16 v.

17 WATTS WATER TECHNOLOGIES, INC.,
 18 WATTS REGULATOR CO., WATTS
 19 ANDERSON-BARROWS METAL CORP.,
 20 WATTS PLUMBING TECHNOLOGIES
 (TAIZHO) CO., LTD., SAVARD PLUMBING
 COMPANY, WOLVERINE BRASS, INC.,
 AND JOHN DOES 1-100,

21 Defendants.

Case No.: 4:12-cv-01172-YGR

STIPULATION AND ~~PROPOSED~~
 PROTECTIVE ORDER RE
 PRODUCTION OF TECHNICAL
 REPORTS ON ALLEGED FAILURES
 OF CONNECTORS

The Honorable Yvonne Gonzalez Rogers

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1 Defendant Watts Regulator Co.'s ("Watts") has proposed to produce certain technical
2 reports, which it represents were prepared in anticipation of litigation and which relate to the
3 alleged failure of toilet connector coupling nuts, under the terms of a protective order. The
4 parties here STIPULATE AND AGREE that the production of such reports shall have the
5 following legal effect:

6 (1) The waiver of work product by Watts shall be limited to the reports themselves
7 and shall not extend to any other work product of Watts or its counsel.

8 (2) The production of the reports shall not constitute a waiver of any attorney-
9 client privilege.

10 (3) Nothing in this order precludes Plaintiffs from deposing the authors of the
11 reports or his employees and associates with firsthand knowledge of the analyses of alleged
12 failures that are the subject of the reports.

13 (4) The parties agree that any technical report previously produced in arbitration or
14 other litigation does not constitute work product. This protective order shall also not apply
15 to any of those other reports that do not constitute work product.

16 (5) Plaintiffs have not seen the technical reports which are the subject of this
17 protective order. Plaintiffs may seek relief from the terms of this protective order for good
18 cause shown.

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1 (6) This protective order applies to this action only and shall not be construed to
2 require the production of the reports, or the waiver of work product, in any other legal
3 proceeding.

4 Dated: April 9, 2013

5 DAVID S. MacCUIISH
6 TODD BENOFF
7 LINDSAY CARLSON
8 ALSTON & BIRD LLP

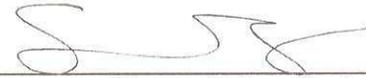
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10 David S. MacCuish

11 Attorneys for Defendants
12 WATTS REGULATOR CO., WATTS
13 WATER TECHNOLOGIES, INC. and
14 WOLVERINE BRASS, INC.

15 Dated: April 9, 2013

16 SIMON BAHNE PARIS
17 PATRICK HOWARD
18 CHARLES J. KOCHER
19 SALTZ, MONGELUZZI, BARRETT &
20 BENDESKY, P.C.

21 

22 Simon Bahne Paris

23 Interim Class Counsel

24 A party wishing to file any document subject to
25 this protective order must comply with Civ. L.R.
26 79-5. This Order terminates Dkt. No. 118.

27 IT IS SO ORDERED:

28 Dated: April 10, 2013



Honorable Yvonne Gonzalez Rogers
United States District Court Judge