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9 **UNITED STATES DISTRICT COURT**
 10 **NORTHERN DISTRICT OF CALIFORNIA**

12 KAYLEIGH SLUSHER, Deceased, THROUGH)
 HER SUCCESSOR IN INTEREST JASON)
 13 SLUSHER; JASON SLUSHER, Individually;)
 ROBIN SLUSHER, Individually; and BENNY)
 14 SLUSHER, Individually,)

Case No. 4:15-cv-02394-SBA (JCS)
 Hon. Sandra Brown Armstrong
 Hon. Joseph C. Spero

15 Plaintiffs,)
 vs.)

16 CITY OF NAPA, a public entity; NAPA POLICE)
 17 OFFICER GARRETT WADE, Individually;)
 NAPA POLICE OFFICER DEGUILIO,)
 18 Individually; NAPA CHIEF OF POLICE)
 RICHARD MELTON, Individually and in his)
 19 Official Capacity; COUNTY OF NAPA, a public)
 20 entity; NAPA COUNTY CHILD WELFARE)
 SERVICES SOCIAL WORKER NANCY)
 21 LEFLER, Individually; NAPA COUNTY CHILD)
 WELFARE SERVICES WORKER ROCIO)
 22 DIAZ-LARA, Individually; and DOES 1-50,)
 23 Jointly and Severally)

**(PROPOSED) ORDER FOR
 EXCHANGE OF DOCUMENTS
 AND INFORMATION
 PURSUANT TO PROTECTIVE
 ORDER**

24 Defendants.)

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1 The Court, having reviewed Plaintiffs' Notice Re: Denial of County Defendants' Motion to
2 Stay, the Court's Order Denying County Defendants' Motion to Stay (Dkt. 99), and the record in
3 this matter, and good cause appearing, this Court hereby Orders as follows:
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5 1) All parties shall receive a complete copy of all Coroner's, Autopsy, and Toxicology reports;
6 complete Coroner's Office investigative files related to the death of Kayleigh Slusher; all
7 photographs of any kind related to the death of Kayleigh Slusher, including but not limited to all
8 autopsy photographs; all recordings, whether by audio or video, related to the death of Kayleigh
9 Slusher; and all statements, interviews, notes, correspondence, or records of any kind related to the
10 death of Kayleigh Slusher.

11 2) The documents and information to be produced specifically includes all records and
12 information in the possession, custody, or control of A) the City of Napa and its police department,
13 concerning Kayleigh Slusher's death and the claims and defenses made in this case, regardless of
14 the source; B) the City of Napa and its police department, concerning all calls for service to
15 Kayleigh Slusher's apartment (2060 Wilkins Avenue, Apt. 7, Napa, CA) prior to February 3, 2014,
16 regardless of the source; C) Napa County concerning Kayleigh Slusher's death and the claims and
17 defenses made in this case, regardless of the source; and D) Plaintiffs, concerning Kayleigh
18 Slusher's death and the claims and defenses made in this case, regardless of the source.

19 3) No party waives any legal right to assert appropriate privileges, with a privilege log.

20 4) All documents and information produced pursuant to this Order shall be deemed
21 confidential and subject to the Protective Order in this matter. (Dkt. 33).

22 5) Should any party need to file any of the documents and information produced pursuant to
23 this Order in court during the pendency of criminal proceedings against Sara Krueger or Ryan
24 Warner, that party shall file the documents and information under seal.

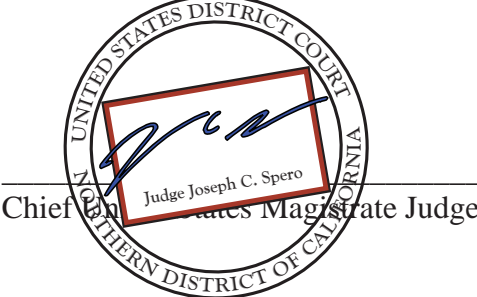
25 6) Plaintiffs and the Napa County Defendants shall produce the documents and information
26 within ten days of this Court's Order. The City of Napa Defendants shall produce the documents
27 and information no later than August 15, 2016, given their counsel's travel outside the country.
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FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

Dated: 7/29/16

HONORABLE JOSEPH C. SPERO



Chief United States Magistrate Judge