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8 UNITED STATES DISTRICT COURT
 9 DISTRICT OF NEVADA

10 ARPITA CAMPO,
 11
 12 Plaintiff

Case No.: 2:12-cv-01353

13 v.

**STIPULATED PROTECTIVE ORDER
 REGARDING ROBERT HALF
 INTERNATIONAL INC. BUSINESS
 RECORDS**

14 ROBERT HALF INTERNATIONAL, a
 15 foreign corporation; DOES 1-10, inclusive;
 16 ROE CORPORATIONS 1-10 inclusive.
 17
 18 Defendants.

19 IT IS HEREBY STIPULATED AND AGREED by Plaintiff Arpita Campo, by and
 20 through her counsel of record, Kirk Kennedy, Esq., and by Defendant Robert Half International
 21 Inc. ("RHI"), by and through its counsel of record, Gregory Smith, Esq. and Amy Baker, Esq., of
 22 Lionel Sawyer & Collins, that a Protective Order be entered on the following terms:

23 1. The business records produced by RHI may contain confidential information and,
 24 if so, either party may so designate as confidential and such designated documents shall be
 25 treated as confidential by the parties. Such confidential documents and information shall be used
 26 solely for the prosecution or defense of this litigation. RHI may designate certain of its business
 27 records as confidential and subject to the terms of this Protective Order by placing an appropriate

1 stamp on the face of the document, indicating that such document has been designated
2 confidential and subject to the terms of this Protective Order. The party designating a document
3 as confidential shall bear the burden of proof as required by law that such document is entitled to
4 protection.

5 2. "Confidential information," as used herein, means information of any type, kind
6 or character which is designated as "confidential" or "proprietary" by any of the supplying or
7 receiving parties, whether it be a document, information contained in a document, information
8 revealed during a deposition, information revealed in any discovery process including but not
9 limited to, depositions or answers to interrogatories. In designating information as "confidential"
10 or "proprietary," a party will make such designation only as to that information that it in good
11 faith believes contains confidential information.

12 3. Such confidential documents and information may be disclosed only to the
13 following persons: (a) parties to this stipulation; (b) counsel for the parties to this stipulation and
14 persons regularly employed in the offices of such counsel; (c) outside experts or professional
15 advisors retained by a party to assist in the prosecution or defense in the case and persons
16 regularly employed in the offices of such outside experts and professional advisors; (d) court
17 personnel, deponents and court reporters/videographers; provided, however, that prior to such
18 disclosure to the persons described in clause (c) above, counsel shall furnish a copy of this
19 Protective Order to such person and obtain the written agreement of such person to be bound by
20 the terms of this Protective Order. The requirement of obtaining such a written agreement may
21 be satisfied by obtaining the signature of any such person at the foot of a copy of this Order.

22 4. The sealing or redacting of any Court Records; which are subject to this
23 Protective Order will be governed by United States District Court District of Nevada Rules LR
24 9018, and LR 10-5. All parties acknowledge that, if the parties do not agree, the party taking the
25 position that it is confidential, has the burden of proving confidentiality to this Court and agree
26 that this agreement alone does not constitute a sufficient basis for the Court to seal or redact
27 Court Records.

