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 7 *Wal-Mart Stores, Inc. and Sam's West, Inc.*

8 UNITED STATES DISTRICT COURT
 9 DISTRICT OF NEVADA

10 ROSALIND MARTINEZ,
 11 Plaintiff,
 12 v.
 13 SAM'S WEST, INC. d/b/a SAM'S CLUB;
 WAL-MART STORES INC.; DOES I through
 14 X; and ROE CORPORATIONS I through X,
 inclusive,
 15 Defendants.
 16

Case No.: 2:15-cv-02013-JCM-VCF

**STIPULATED PROTECTIVE ORDER
 BETWEEN PLAINTIFF ROSALIND
 MARTINEZ AND DEFENDANTS SAM'S
 WEST, INC. AND WAL-MART STORES,
 INC.**

STIPULATED PROTECTIVE ORDER

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 18 The parties to this action, Defendants Wal-Mart Stores, Inc. and Sam's West, Inc.
 19 ("Defendants"), and Plaintiff, Rosalind Martinez, by their respective counsel, hereby stipulate and
 20 request that the Court enter a stipulated protective order pursuant as follows:
 21

- 22 1. The Protective Order shall be entered pursuant to the Federal Rules of Civil Procedure
 23 and applicable local rules for the United States District Court, District of Nevada
- 24 2. The Protective Order shall govern all materials identified as "Confidential" by the
 25 parties. Disclosed materials claimed to be confidential in nature shall be produced by placing the
 26 following legend on the face of each document and each page so designated "CONFIDENTIAL" or
 27 otherwise expressly identified as confidential. The parties will use best efforts to limit the number of
 28

1 documents designated as “Confidential.” Confidential Information in this case shall include the
2 following: all Defendants’ policies and procedures and training materials (Bates Nos. WM2015-
3 015637-0001 through WM2015-015637-0148), information regarding prior claims in the subject
4 Sam’s Club store (Bates No. WM2015-015637-0193), and maps/schematics of the subject Sam’s Club
5 store (Bates No. WM2015-015637-0163).
6

7 3. Confidential Information shall be held in confidence by each party or his or her
8 representatives, attorneys, agents, and so forth, for use solely for the purposes of this action and not
9 for any business purpose. Documents designated as confidential may not be disclosed to persons or
10 parties whose relationship to the dispute between the parties is not reasonably related to the
11 prosecution or defense of claims litigated.
12

13 4. Each counsel shall be responsible for providing notice of the Protective Order and the
14 terms therein to persons to whom they disclose “Confidential Information,” as defined by the terms of
15 the Protective Order.

16 5. The parties will file under seal any confidential information included in any papers,
17 motions, or pleadings to avoid the public disclosure of said information. pursuant to LR IA 10-5 and

Kamakana v. City and County of Honolulu, 447 F.3d 1172 (9th Cir. 2006)

18 6. The termination of this action shall not relieve the parties and persons obligated
19 hereunder from their responsibility to maintain the confidentiality of information designated
20 confidential pursuant to this Order.
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22 7. After the final adjudication or resolution of this Lawsuit (“final adjudication” will
23 include the resolution of any appeals), a party may make a written demand to the other party for the
24 return of confidential materials, including all copies and reproductions thereof. The party receiving the
25 written demand shall have thirty (30) days from receipt of the written demand to comply with same.

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8. Nothing in the Protective Order shall be deemed to preclude any party from seeking and obtaining, on an appropriate showing, a modification of this Order.

DATED this 23rd day of May 2016.

DATED this 23rd day of May 2016.

MAINOR WIRTH, LLP

PHILLIPS, SPALLAS & ANGSTADT LLC



/s/ 

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*Attorneys for Plaintiff
Rosalind Martinez*

*Attorneys for Defendants
Wal-Mart Stores, Inc. and Sam's West, Inc.*

1 The terms of the above stipulation for a protective order by and between Defendants, Wal-
2 Mart Stores, Inc. and Sam's West, Inc. and Plaintiff, Rosalind Martinez, by their respective counsel,
3 shall hereby be the ORDER of this Court.

4 DATED this 24th day of May _____, 2016

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7 UNITED STATES MAGISTRATE JUDGE

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