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6 Attorneys for the City of Santa Cruz and  
 7 the Santa Cruz Police Department

8 UNITED STATES DISTRICT COURT  
 9 FOR THE DISTRICT OF NEVADA

12 KELLY GUERRERO,

13 Plaintiff,

14 vs.

15 VINCENT NEIL WHARTON,

16 Defendant.

**Case No. 2:16-cv-01667-GMN-NJK**

**STIPULATION; ~~PROPOSED~~ PROTECTIVE ORDER**

19 **I. STIPULATION**

20 WHEREAS, Defendant Vincent Neil Wharton, acting by and through his attorney, James Kohl,  
 21 and the Santa Cruz Police Department or City of Santa Cruz, a municipal corporation (hereinafter  
 22 "City"), acting by and through its attorneys, agree and stipulate as follows:

23 1. Mr. Kohl, counsel for Defendant, caused a subpoena *duces tecum* to be served on the  
 24 Santa Cruz Police Department by depositing the subpoena in the mail on or about January 22, 2018  
 25 ("subpoena"). This subpoena demanded production of SCPD reports pertaining to Plaintiff Kelly  
 26 Guerrero from July 14, 2011 to the present.  
 27

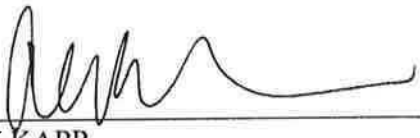


1           4.     Not to use the Confidential Material for any purpose other than the defense and  
2 prosecution of the above-entitled civil matter, including, but not limited to production during discovery,  
3 use during depositions and motion practice before the Court. The Confidential Material shall not be used  
4 in any other criminal or civil proceeding.

5           5.     To destroy the Confidential Material upon final adjudication or other disposition of this  
6 case.

7           This order does not restrict the conveyance, transfer, publishing or distribution of information  
8 solely between the attorneys during the course of these proceedings as required by law.

9  
10  
11 Dated: February 7, 2018

12  
13 By:   
14 AMY KAPP  
15 Attorney for CITY OF SANTA CRUZ,  
16 SANTA CRUZ POLICE DEPARTMENT

17 By:   
18 JAMES KOHL  
19 Attorney for Defendant VINCE NEIL WHARTON

20 Dated: February 8, 2018

21   
22 NANCY J. KOPPE  
23 United States Magistrate Judge