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6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE DISTRICT OF ARIZONA

8 Manuel de Jesus Ortega Melendres, on
9 behalf of himself and all others similarly
10 situated; et al.

11 Plaintiffs,

12 v.

13 Joseph M. Arpaio, in his individual and
14 official capacity as Sheriff of Maricopa
County, AZ; et al.

15 Defendants.

No. CV-07-2513-PHX-GMS

**STIPULATED PROTECTIVE
ORDER**

16 **IT IS HEREBY ORDERED** that the parties' Stipulated Protective Order (Doc.
17 728) is APPROVED and ADOPTED as follows:

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19 A. If Defendants believe that a document responsive to the May 21
20 Document Request is non-public and should be produced to Plaintiffs confidentially, as
21 described in Paragraph 150 of this Court's Supplemental Permanent Injunction/Judgment
22 Order dated October 2, 2013, Defendants may produce the document to Plaintiffs'
23 counsel subject to a designation that Plaintiffs' counsel shall maintain the document as
24 confidential.

25 B. If Defendants so designate any document, Plaintiffs' counsel are
26 prohibited from disclosing the document to anyone other than: (1) the Court, including
27 court reporters and the Monitor and his staff; and (2) paralegals or other support staff
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1 employed by Plaintiffs' counsel. Support staff associated with Plaintiffs' counsel are
2 subject to the same confidentiality requirements required of Plaintiffs' counsel. For
3 purposes of this Order, Plaintiffs' counsel means only counsel of record for the named
4 Plaintiff and the Class in this case.

5 C. Defendants shall clearly designate documents disclosed pursuant to
6 this stipulation by affixing the words "CONFIDENTIAL – ATTORNEYS' EYES
7 ONLY" to each page for documents produced in paper format (or an electronic
8 equivalent, such as an MS Word or PDF file). For documents produced in other formats,
9 including but not limited to video or audio recordings, Defendants shall clearly label the
10 relevant medium (e.g., a CD or DVD disc) with the words "CONFIDENTIAL –
11 ATTORNEYS' EYES ONLY."

12 D. Defendants shall notify Plaintiffs in writing when any document
13 produced subject to the confidentiality designation is no longer subject to the restriction.
14 After such time, Plaintiffs shall not be under any obligation to restrict disclosure of the
15 document pursuant to this Stipulated Protective Order.

16 E. Plaintiffs shall be permitted to challenge any confidentiality
17 designation by seeking relief from this Court after meeting and conferring with
18 Defendants, but remain subject to the confidentiality obligation unless and until this
19 Court orders the confidentiality designation to be removed from the document. In any
20 dispute regarding a confidentiality designation, Defendants shall bear the burden of
21 proving that the designation is proper.

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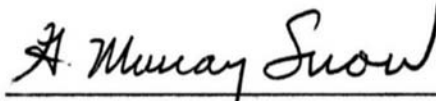
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1 F. If any document produced by Defendants subject to the
2 confidentiality designation is submitted to this Court, the submitting party shall file the
3 document under seal.

4 Dated this 18th day of July, 2014.

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7 G. Murray Snow
8 United States District Judge
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