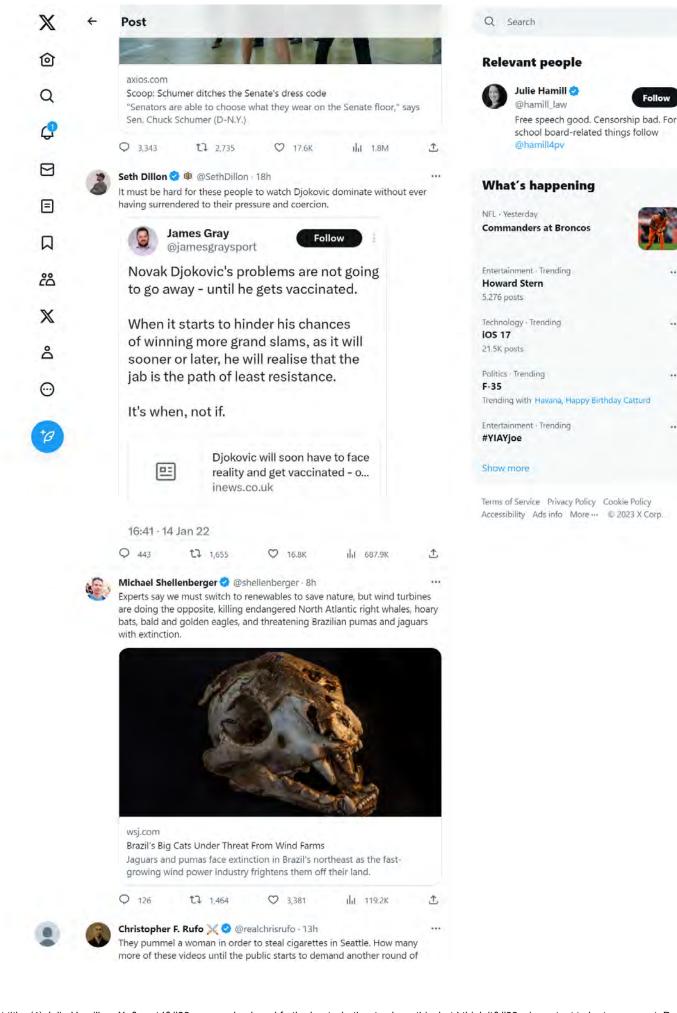
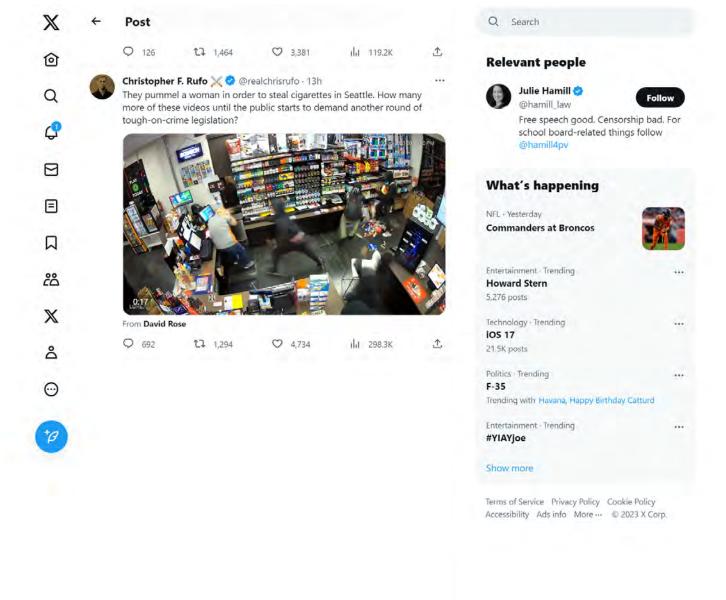
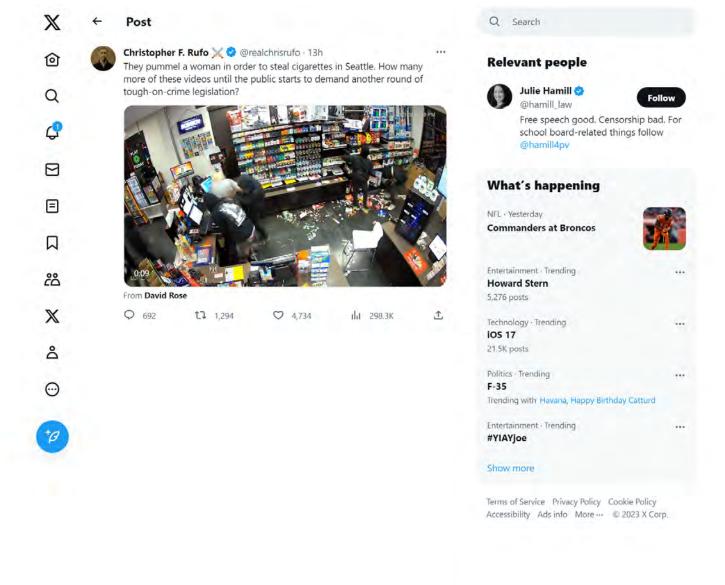


"Senators are able to choose what they wear on the Senate floor," says

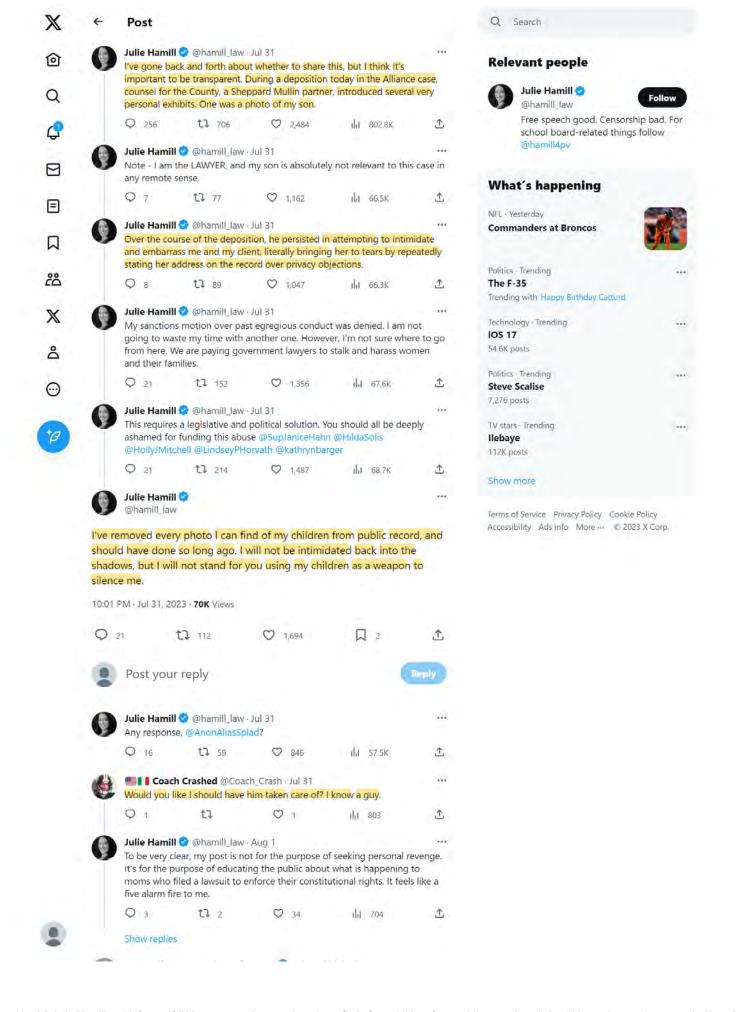


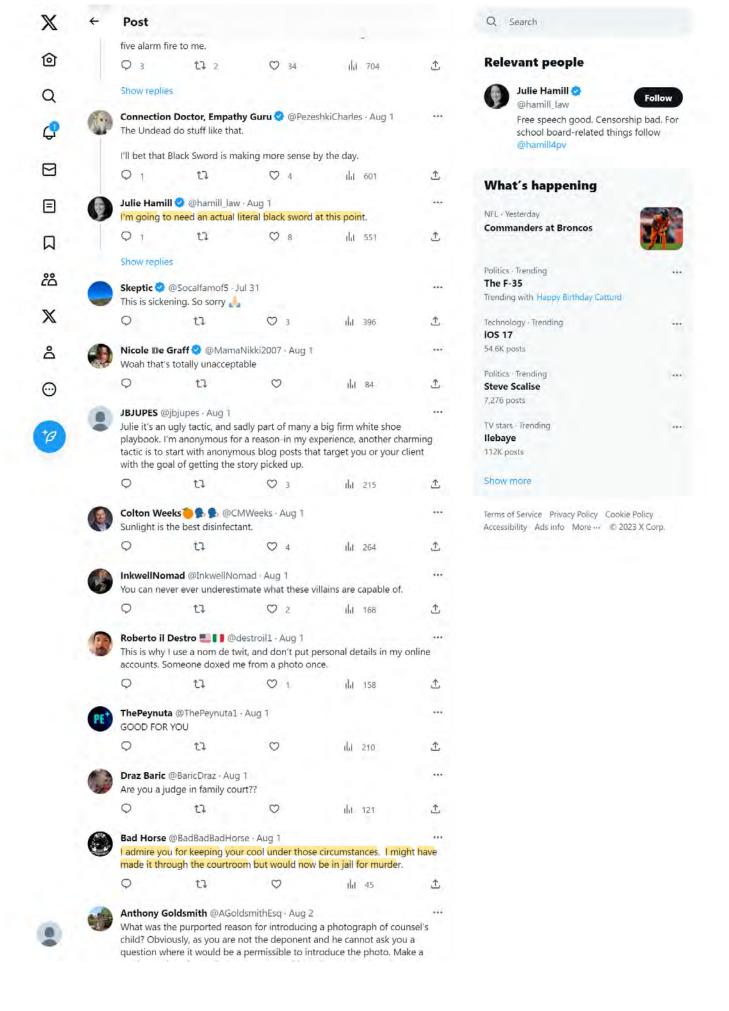


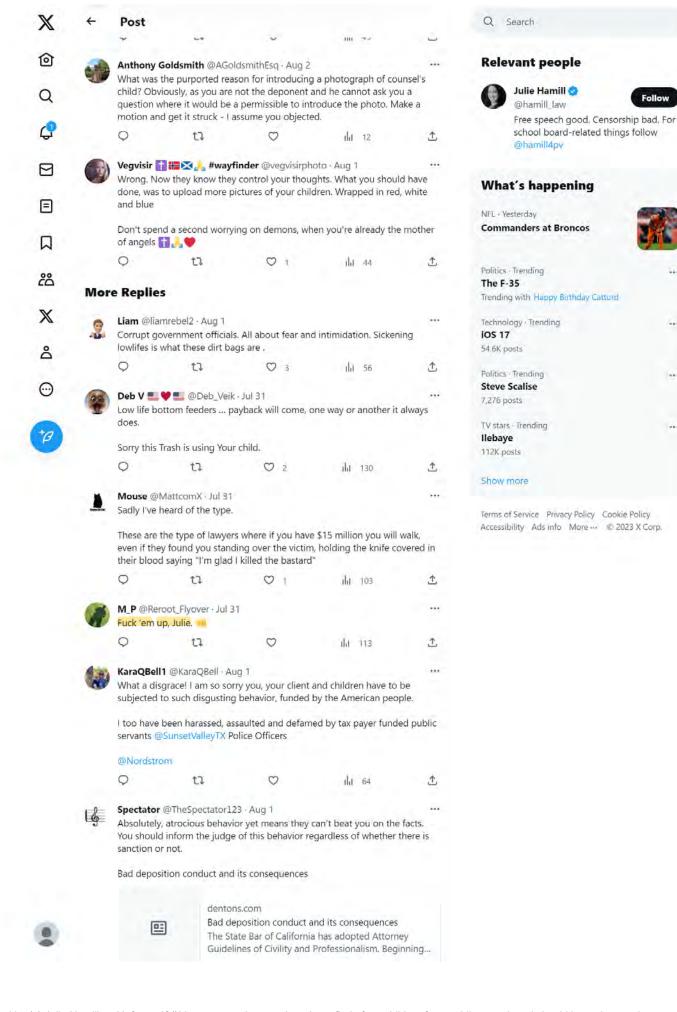




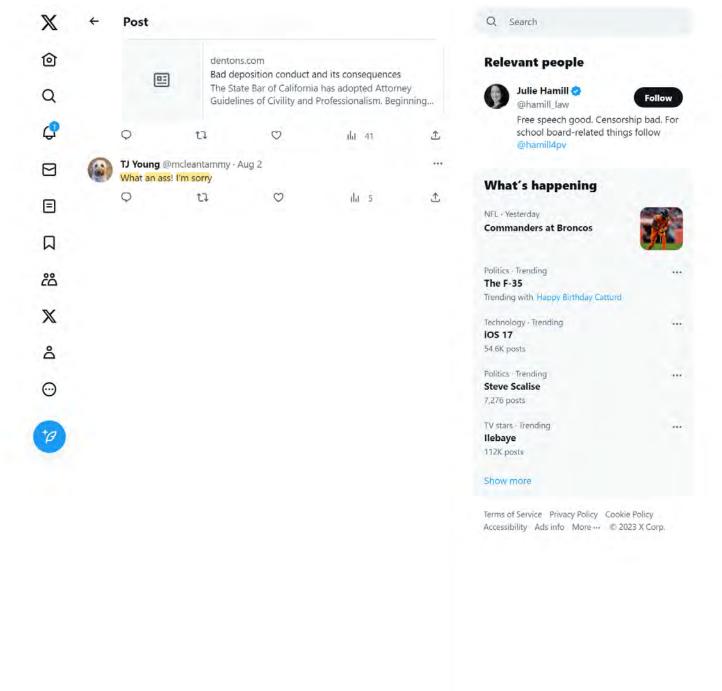
Document title: (1) Julie Hamill on X: "I've removed every photo I can find of my children from public record, and should have done so long ago. I will not be intimidated back into the shadows, but I will not stand for you using my children as a weapon to silence me." / Capture URL: https://twitter.com/hamill_law/status/1686134969750761472 Page loaded at (UTC): Mon, 18 Sep 2023 19:07:42 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 19:08:42 GMT Capture tool: 10.29.2 54.157.181.49 Collection server IP: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 6 Capture ID: 33Arp8HDkPxfqDZeV6KUHH User: sm-lchu PDF REFERENCE #: t1knZSQxGZhJAANrjV6e1n _

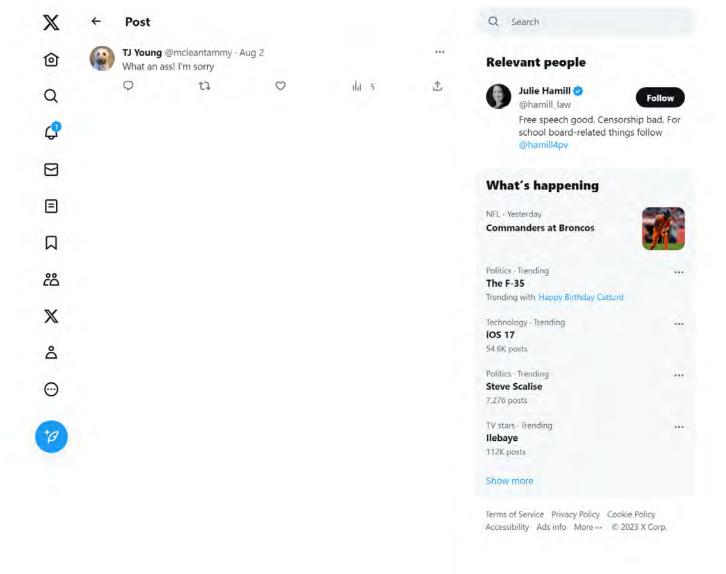






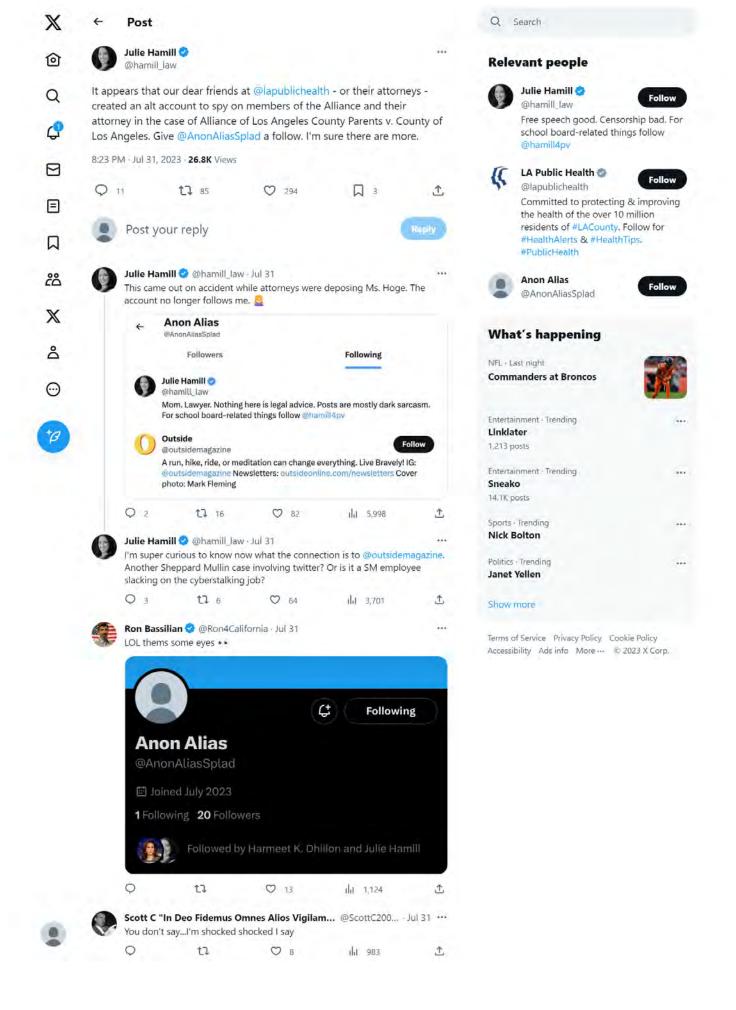
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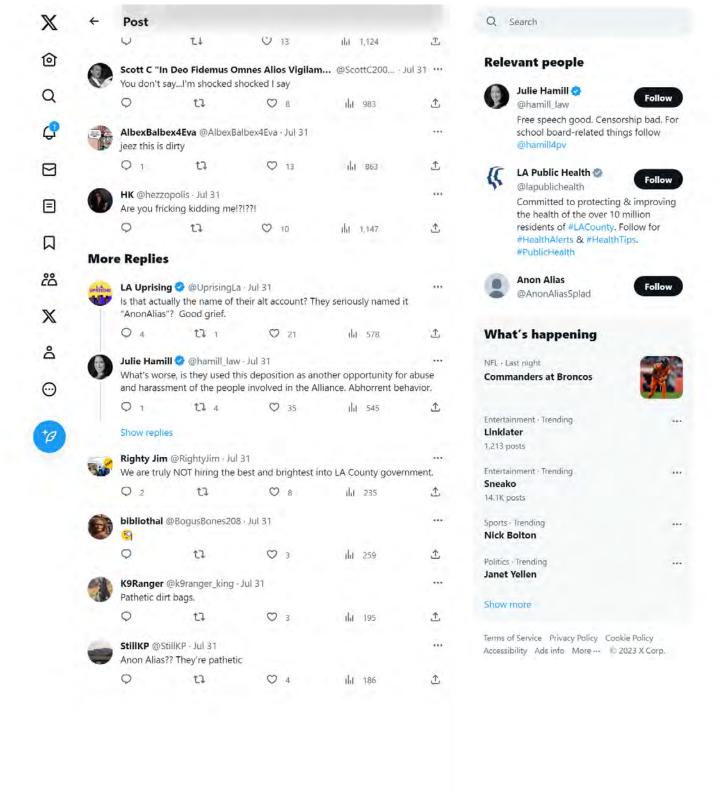


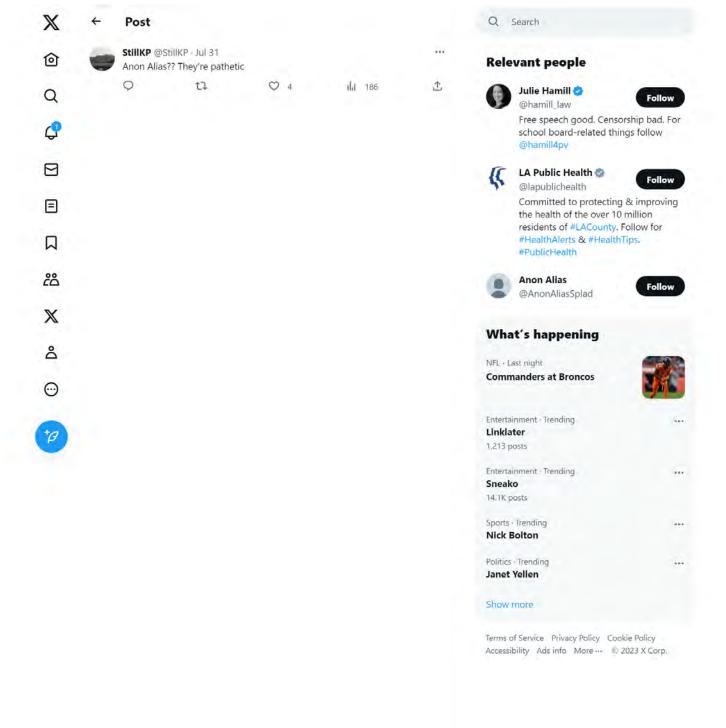




Document title: (1) Julie Hamill on X: "It appears that our dear friends at @lapublichealth - or their attorneys - created an alt account to spy on members of the Alliance and their attorney in the case of Alliance of Los Angeles County Parents v. County of Los Angeles. Give @AnonAliasSplad a follow. I'm sure there are..." / X Capture URL: https://twitter.com/hamill_law/status/1686110355519594497 Page loaded at (UTC): Mon, 18 Sep 2023 19:21:04 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 19:21:45 GMT Capture tool: 10.29.2 54.157.181.49 Collection server IP: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 4 Capture ID: voSdcoStgftqkTxqpiiVkF User: sm-lchu PDF REFERENCE #: 5BMdB7LF7mRq7tqTX4bfRr



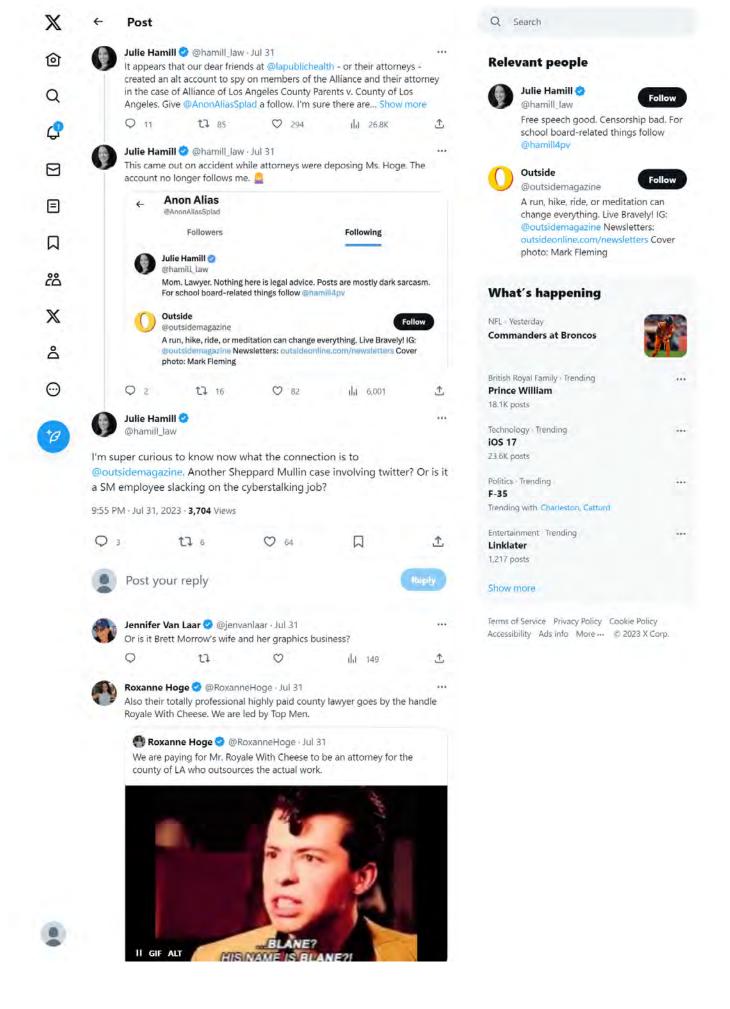


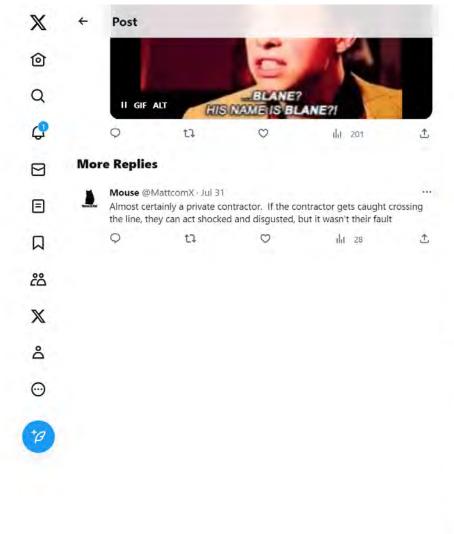


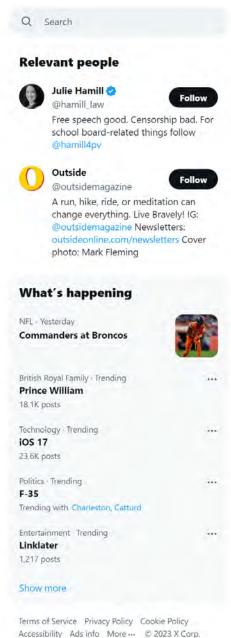


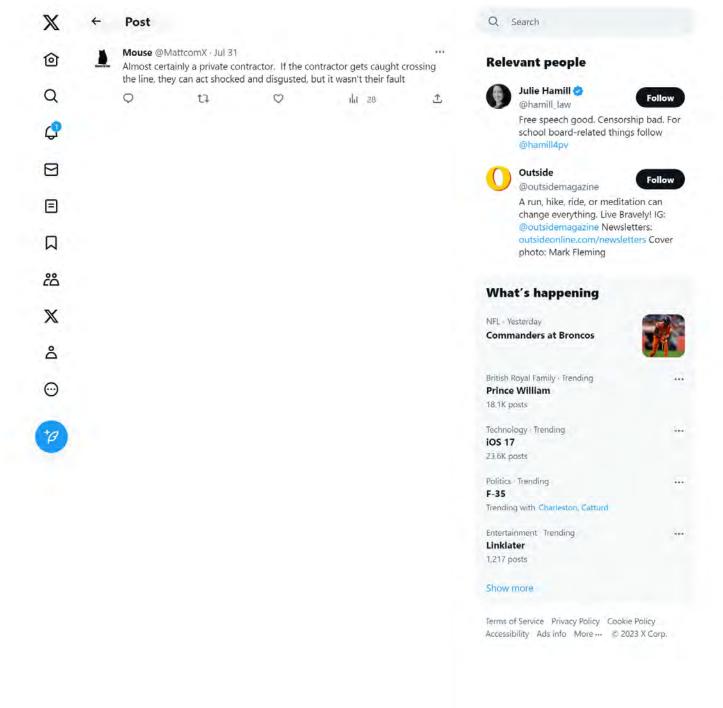


Document title:	(1) Julie Hamill on X: "I'm super curious to know now what the connection is to @outsidemagazine. Another Sheppard Mullin case involving twitter? Or is it a SM employee slacking on the cyberstalking job?" / X	
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Operating system:	Windows_NT (Node 16.17.1)	
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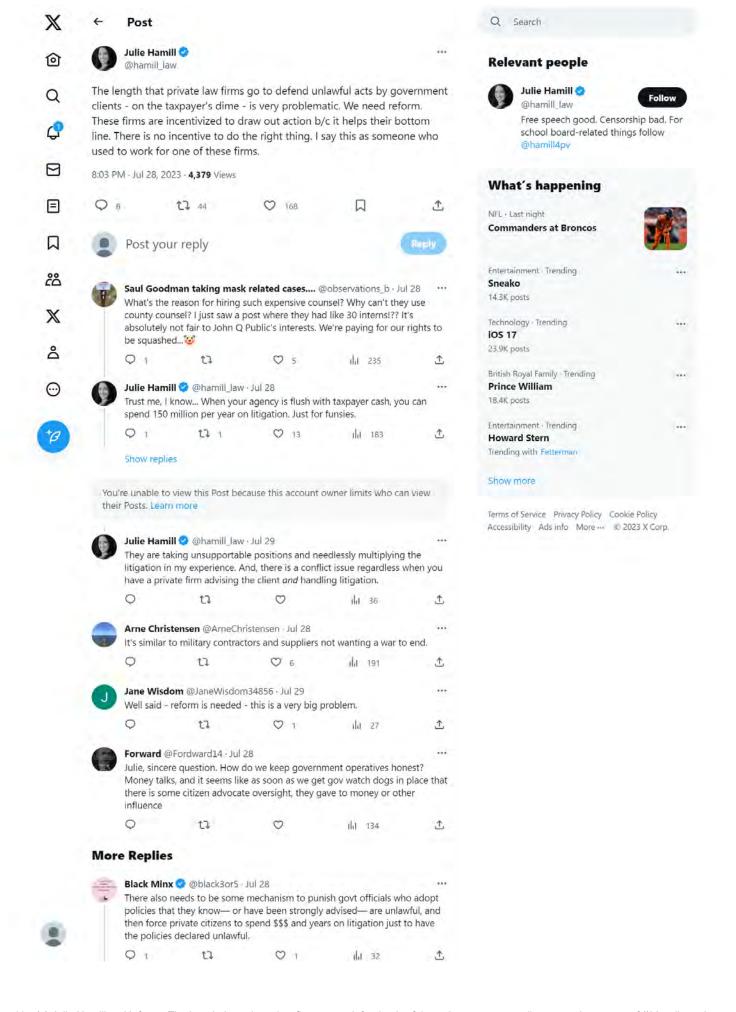


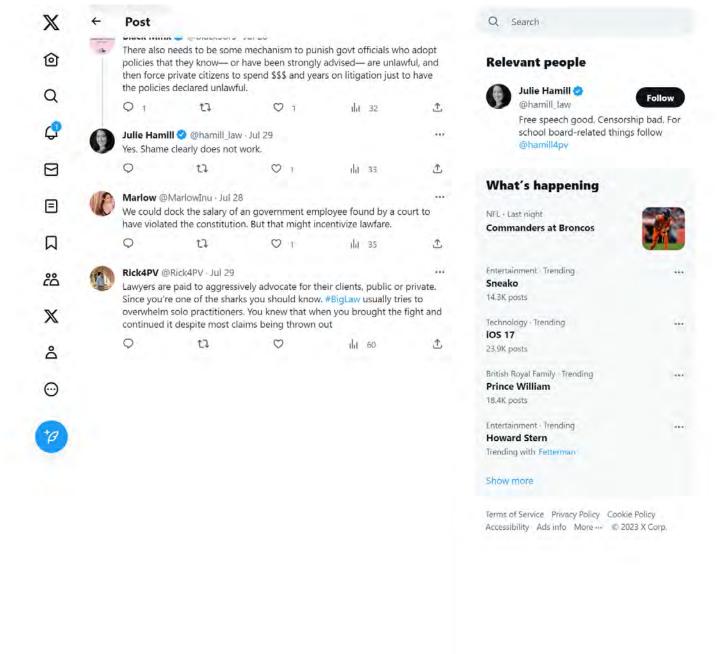


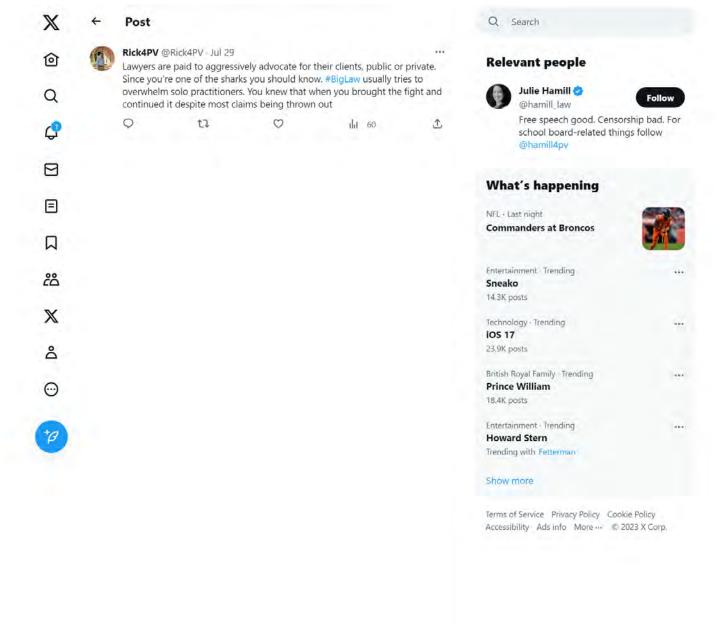




Document title: (1) Julie Hamill on X: "The length that private law firms go to defend unlawful acts by government clients - on the taxpayer's dime - is very problematic. We need reform. These firms are incentivized to draw out action b/c it helps their bottom line. There is no incentive to do the right thing. I say..." / X Capture URL: https://twitter.com/hamill_law/status/1685018102835351552 Page loaded at (UTC): Mon, 18 Sep 2023 19:28:29 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 19:29:07 GMT Capture tool: 10.29.2 54.157.181.49 Collection server IP: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 4 Capture ID: 1a81yrmL4Ms6rbQmtKKjvB User: sm-lchu PDF REFERENCE #: 4eSySy2z83n1yYz5jTwjpd

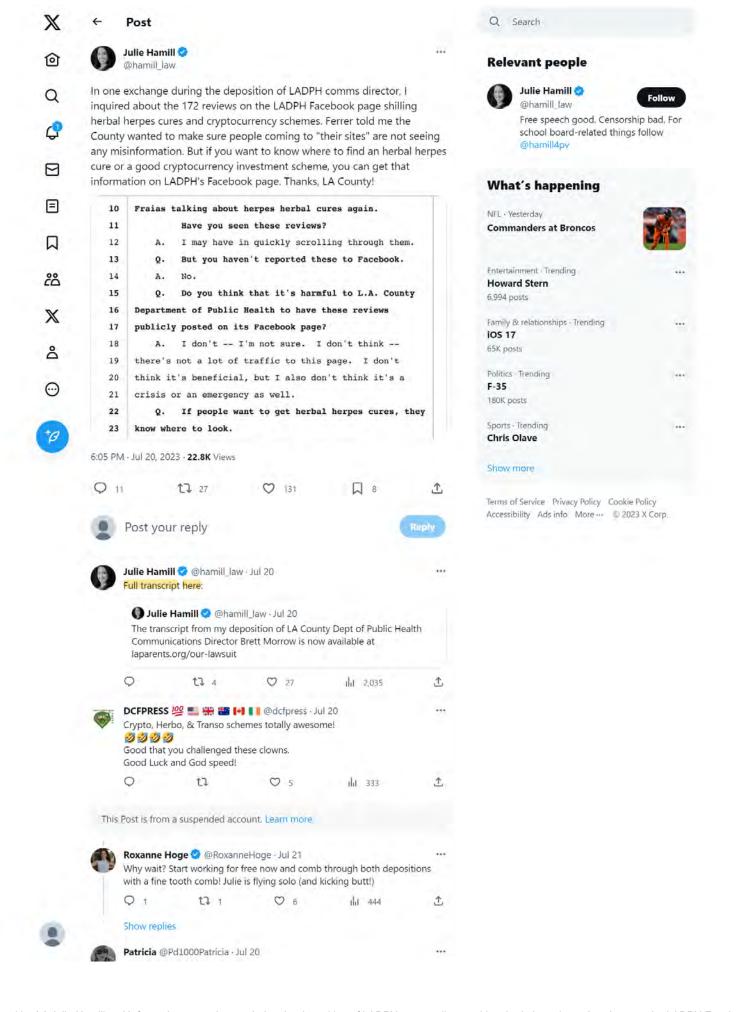


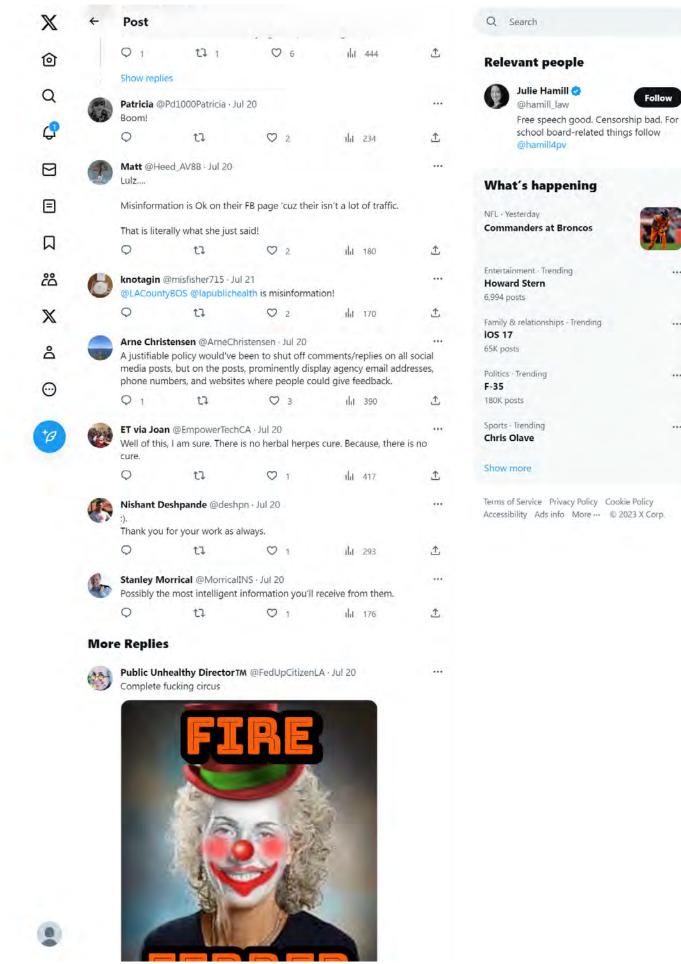


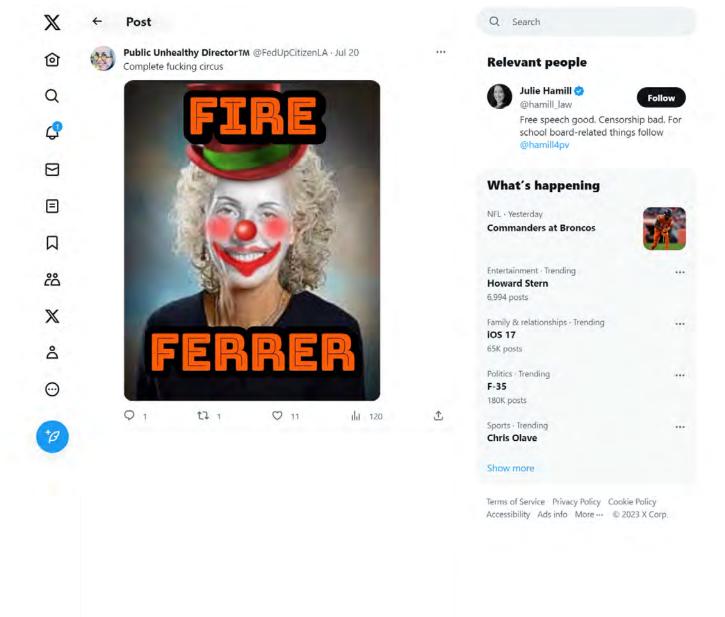




Document title:	director, I inquired herbal herpes cur	n X: "In one exchange during the deposition of LADPH comms d about the 172 reviews on the LADPH Facebook page shilling res and cryptocurrency schemes. Ferrer told me the County wanted ple coming to "their sites" are not seeing any https://t.co/
Capture URL:	https://twitter.com	n/hamill_law/status/1682089479455260672
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PDF length:	4	
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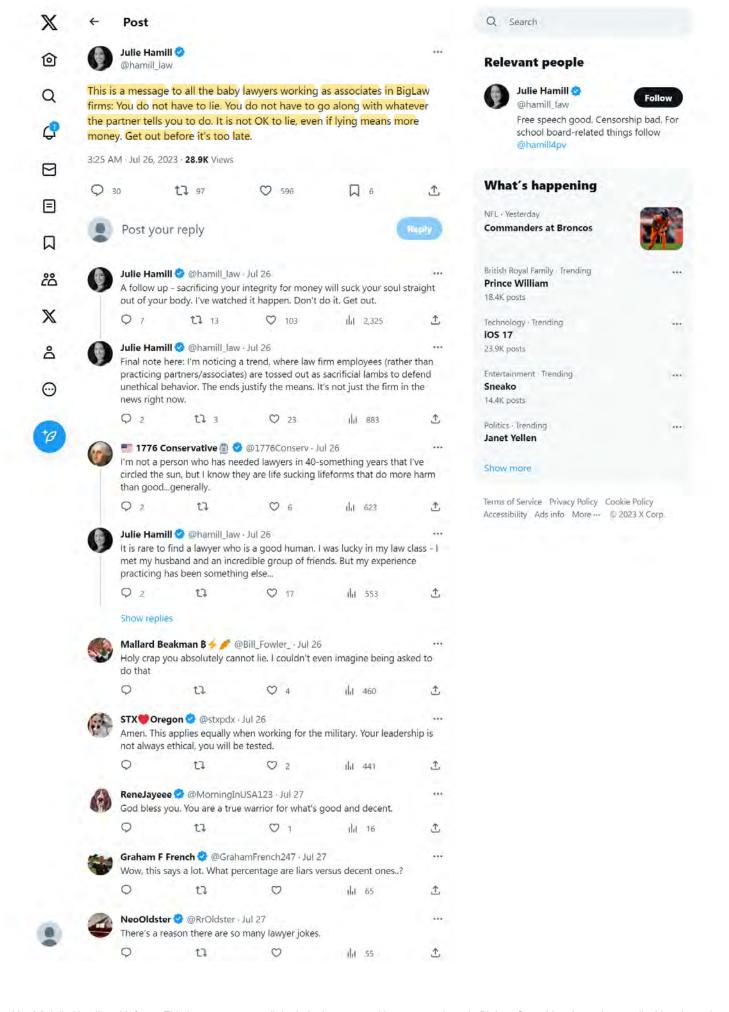


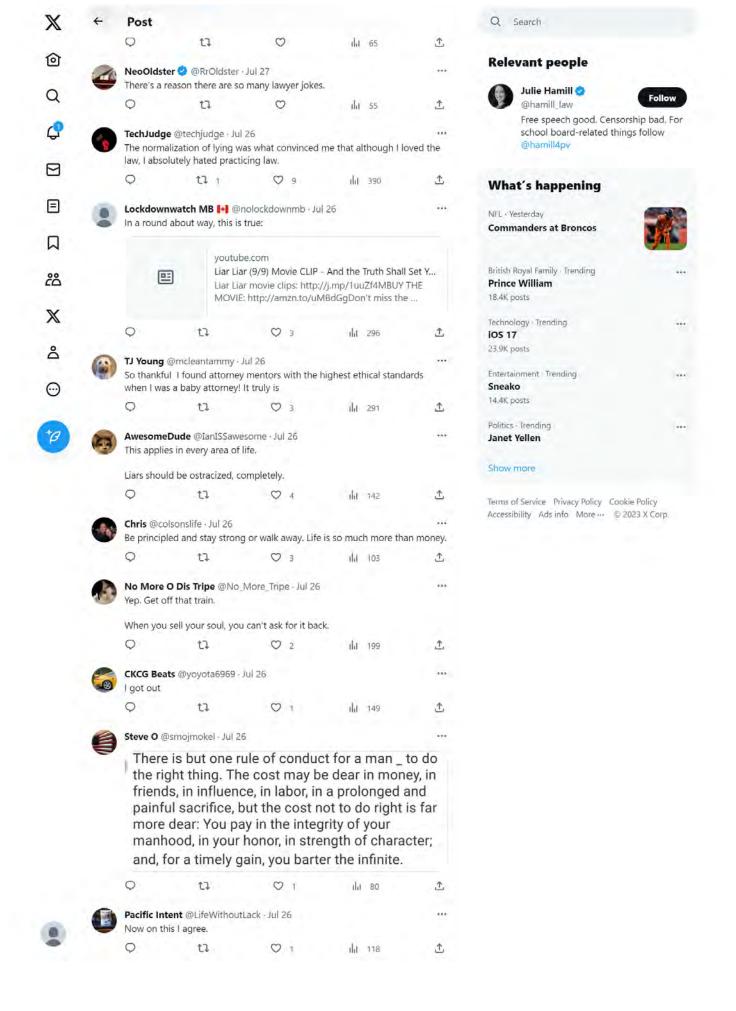


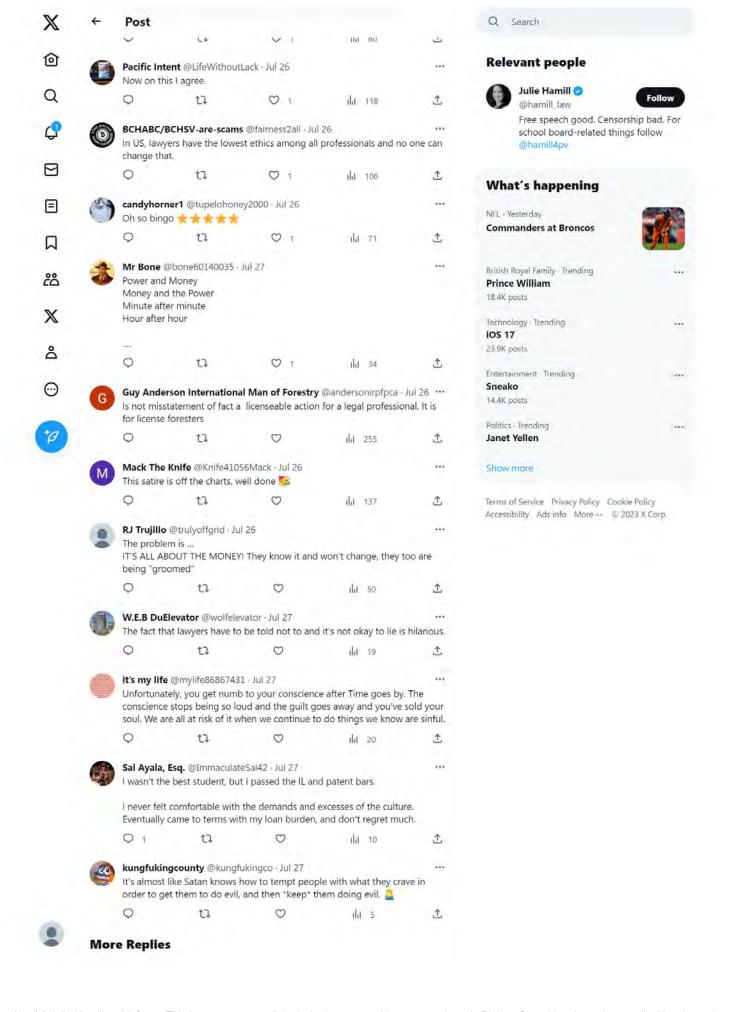


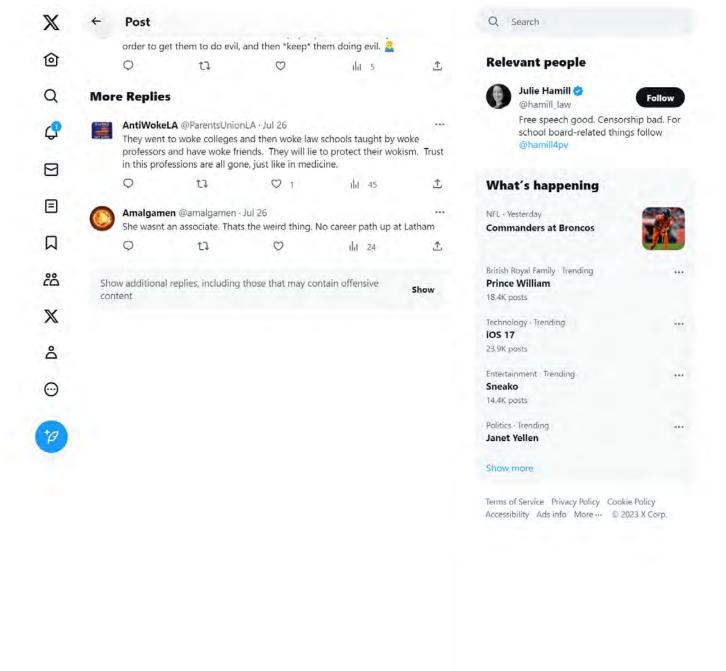


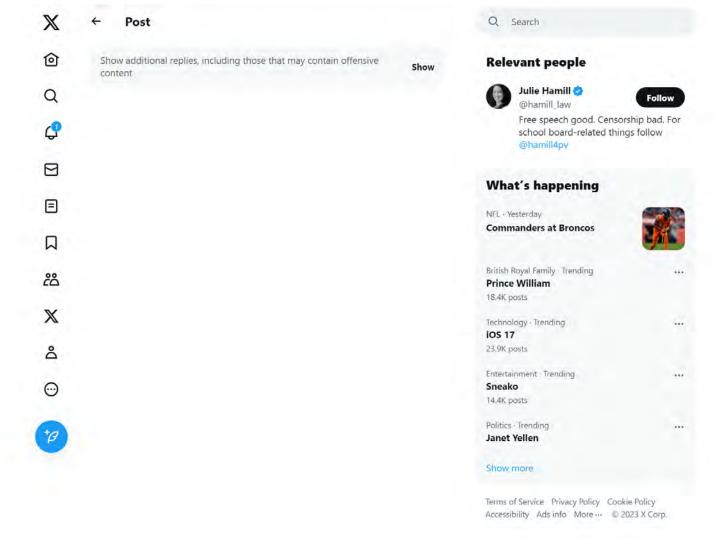
Document title: (1) Julie Hamill on X: "This is a message to all the baby lawyers working as associates in BigLaw firms: You do not have to lie. You do not have to go along with whatever the partner tells you to do. It is not OK to lie, even if lying means more money. Get out before it's too late." / X Capture URL: https://twitter.com/hamill_law/status/1684042345271164929 Page loaded at (UTC): Mon, 18 Sep 2023 19:29:35 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 19:31:07 GMT Capture tool: 10.29.2 Collection server IP: 54.157.181.49 Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 6 Capture ID: iVbGN6fRxRMXgvCfv4gbKY User: sm-lchu PDF REFERENCE #: wYTVFndddjd7kdeoByV4TQ .





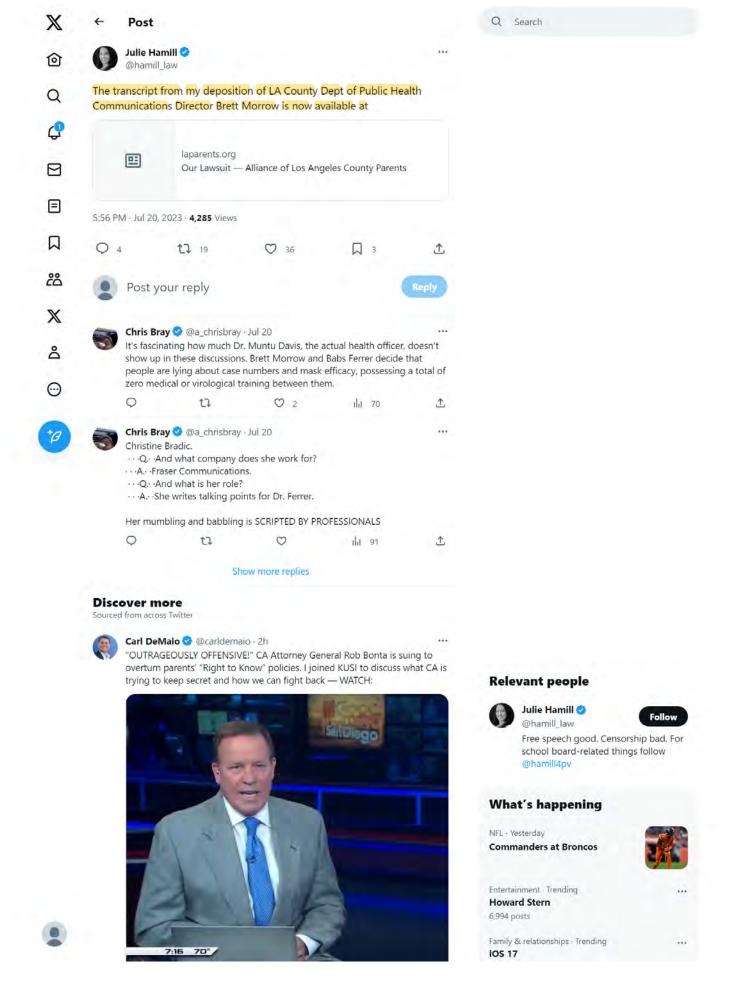


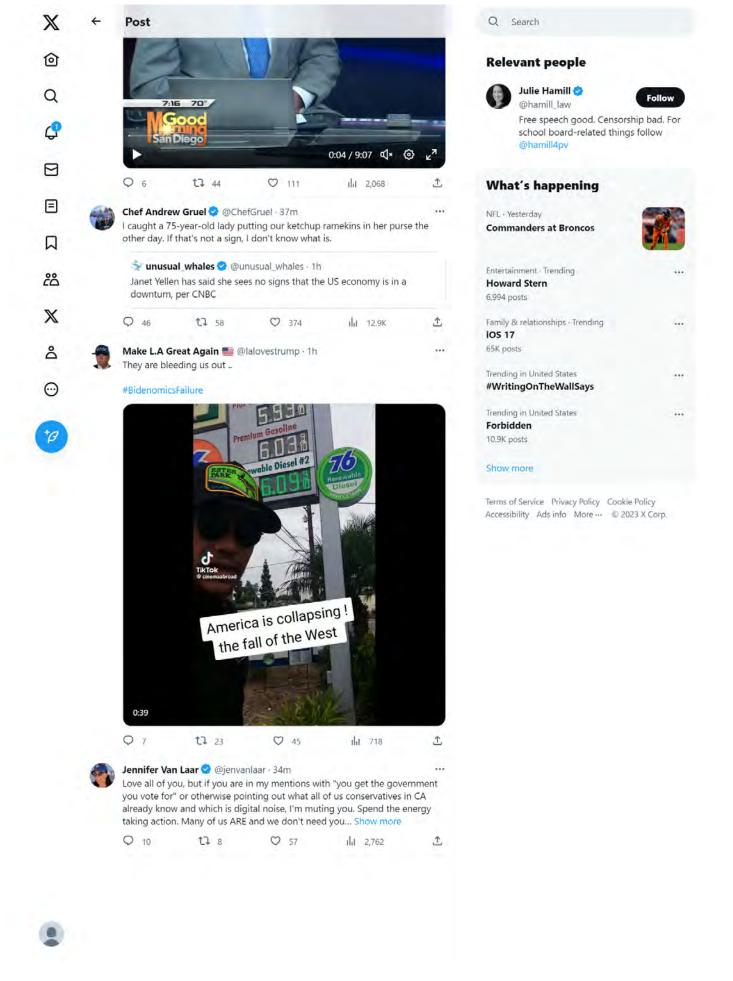


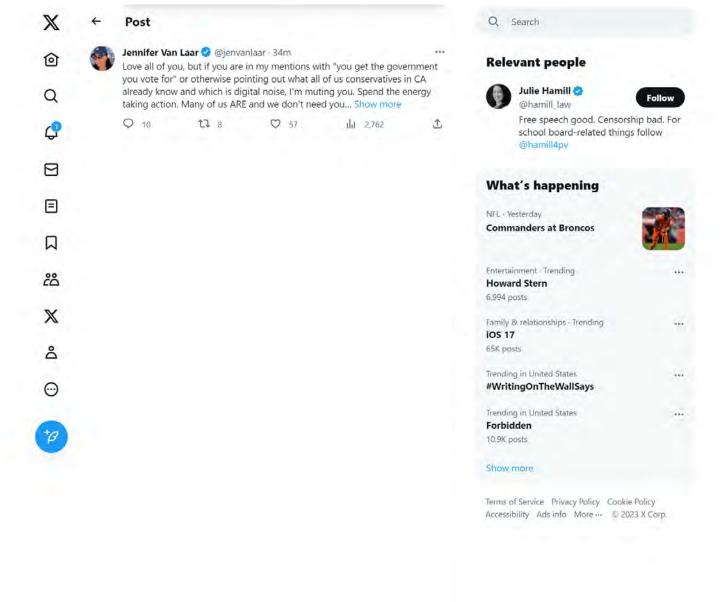




Document title:		n X: "The transcript from my deposition of LA County Dept of Public cations Director Brett Morrow is now available at https://t.co/	
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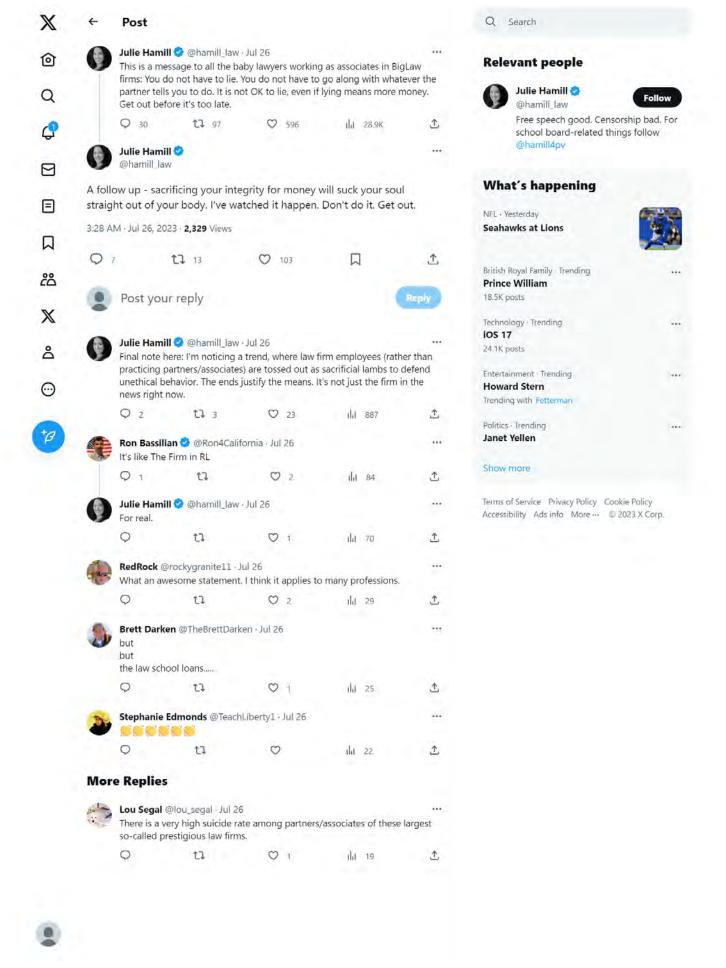


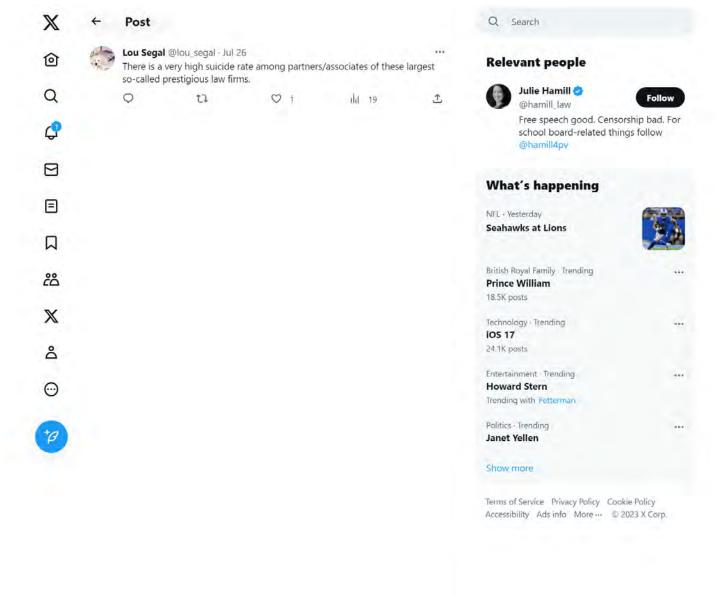


Document title: (1) Julie Hamill on X: "A follow up - sacrificing your integrity for money will suck your soul straight out of your body. I've watched it happen. Don't do it. Get out." / X Capture URL: https://twitter.com/hamill_law/status/1684043074484457472 Page loaded at (UTC): Mon, 18 Sep 2023 19:31:21 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 19:31:53 GMT Capture tool: 10.29.2 Collection server IP: 54.157.181.49 Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Windows_NT (Node 16.17.1) Operating system: PDF length: 3 Capture ID: 7mWDwPAdhDw6d7JbwL6jJj User: sm-lchu

vy5AnpenS2HcbRMb2bAX5o

PDF REFERENCE #:







Document title: (1) Julie Hamill on X: "In the interest of transparency and accountability, I am sharing

my latest email in the Alliance case. There will be no accountability, no justice, and no end to the weaponization of government absent public attention and sunshine. @SupJaniceHahn @HollyJMitchell @kathrynbarger... https://t.co/eBb0LfFklx" / X

Capture URL: https://twitter.com/hamill_law/status/1681002249236144128

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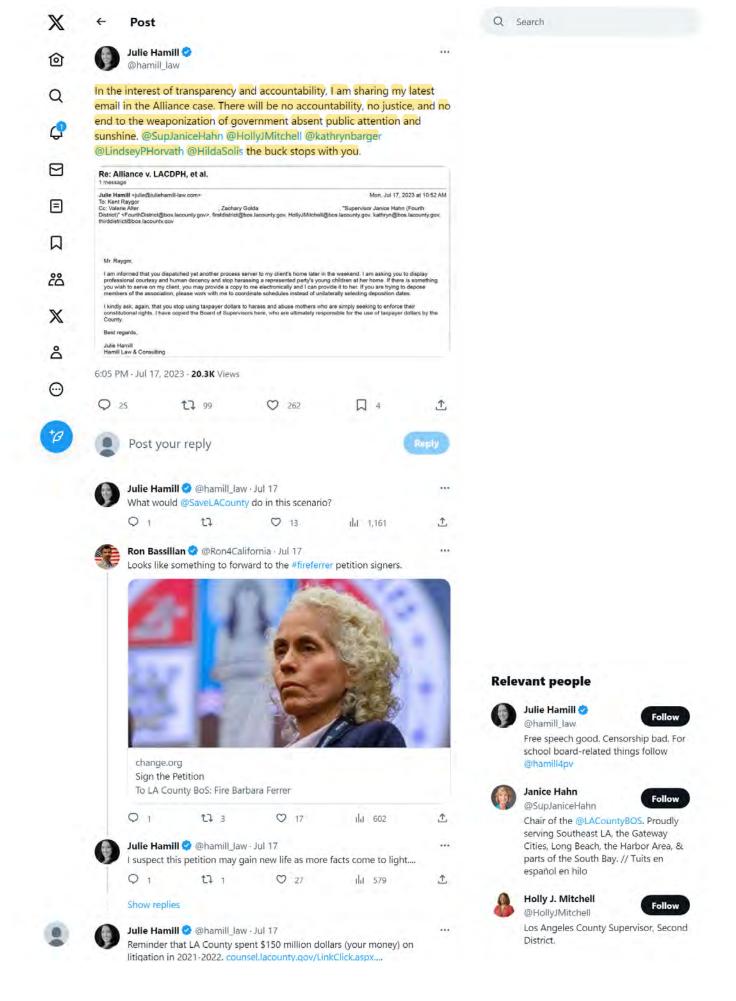
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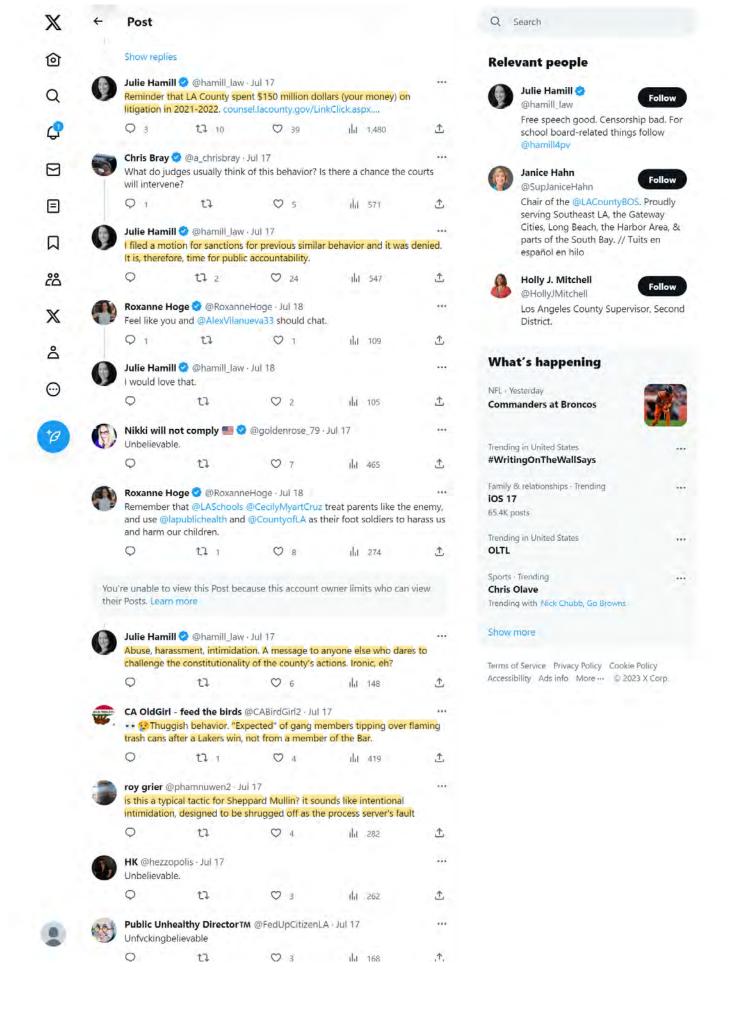
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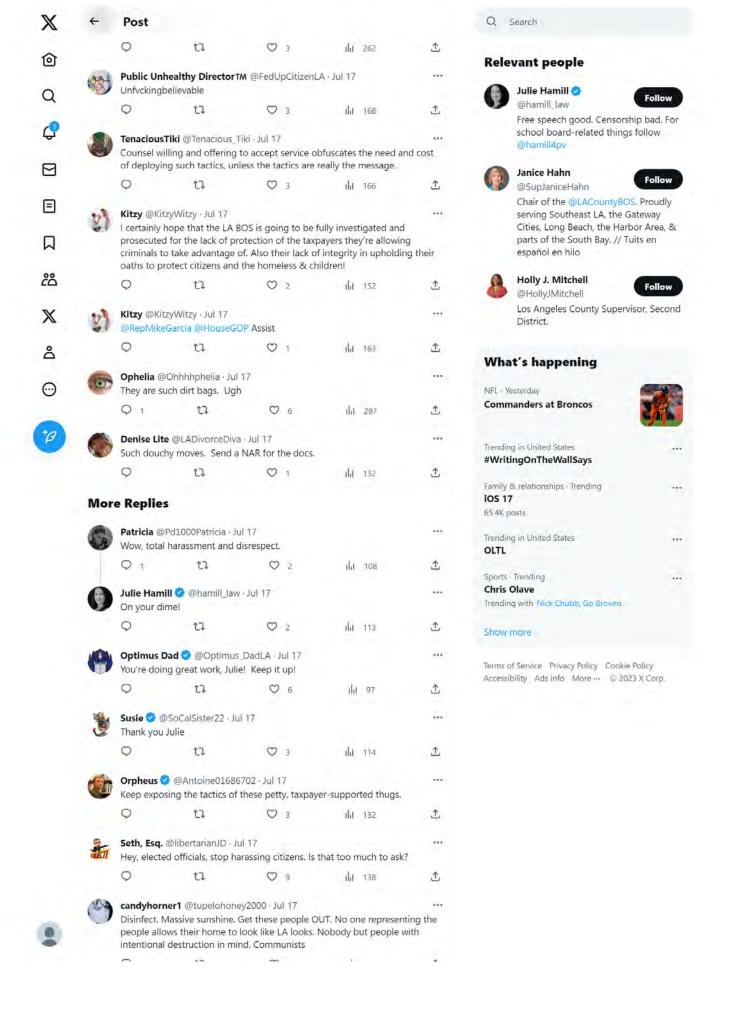
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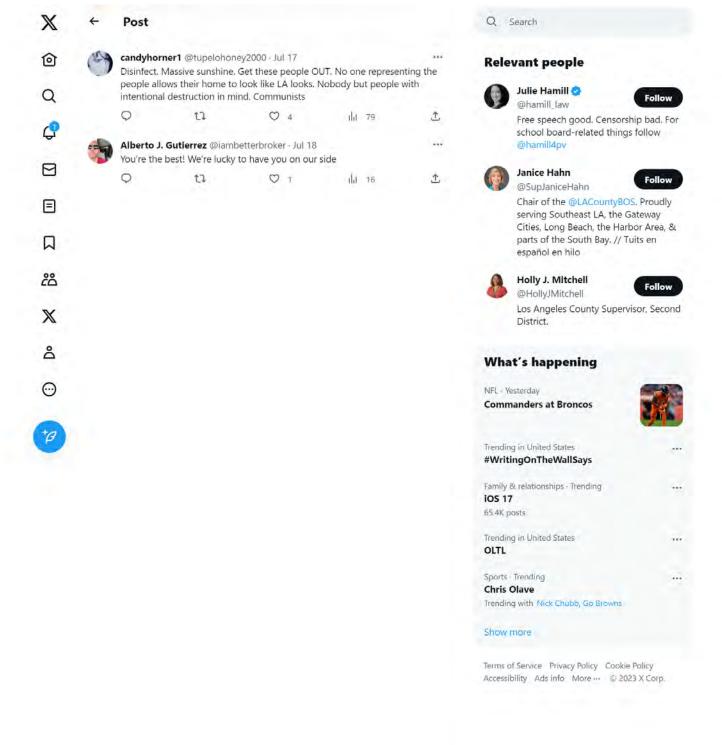
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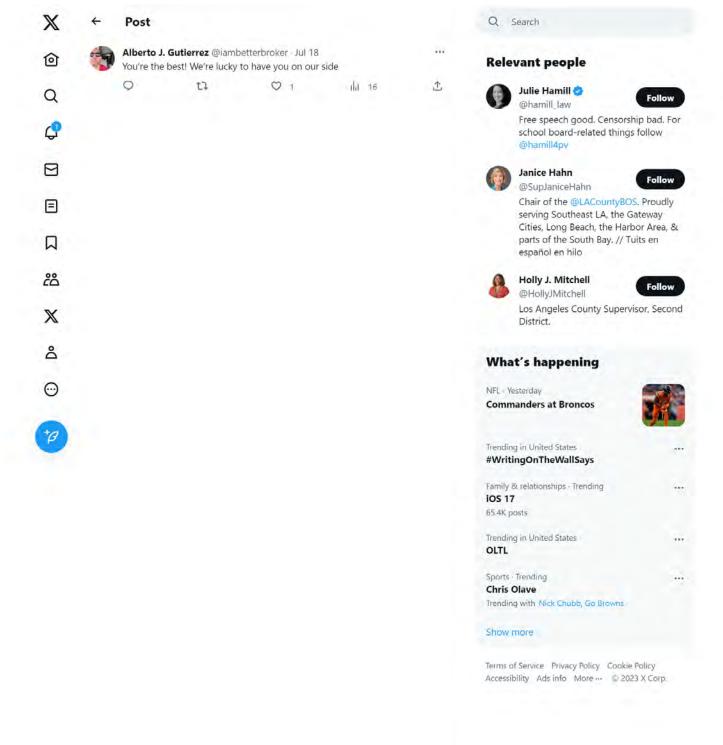








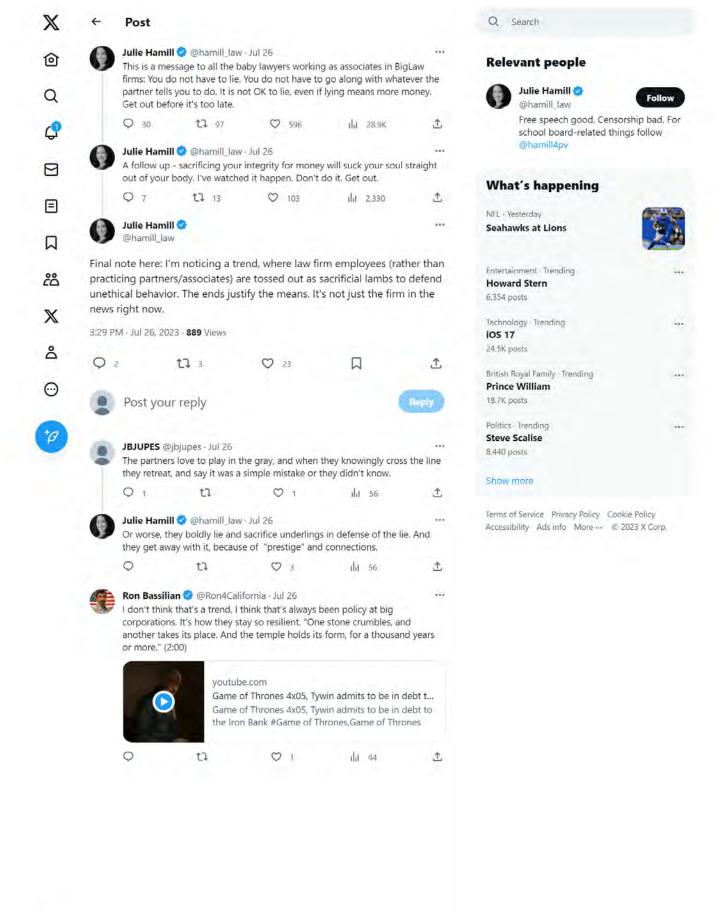


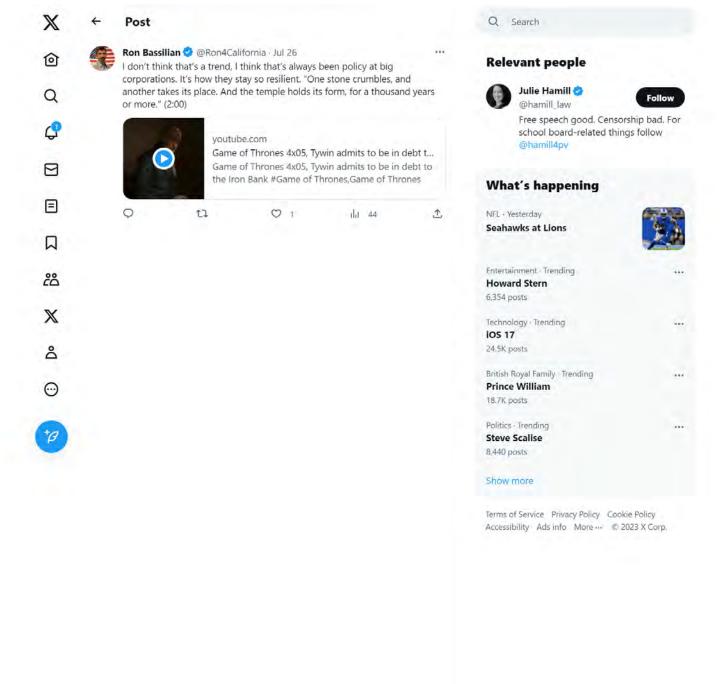






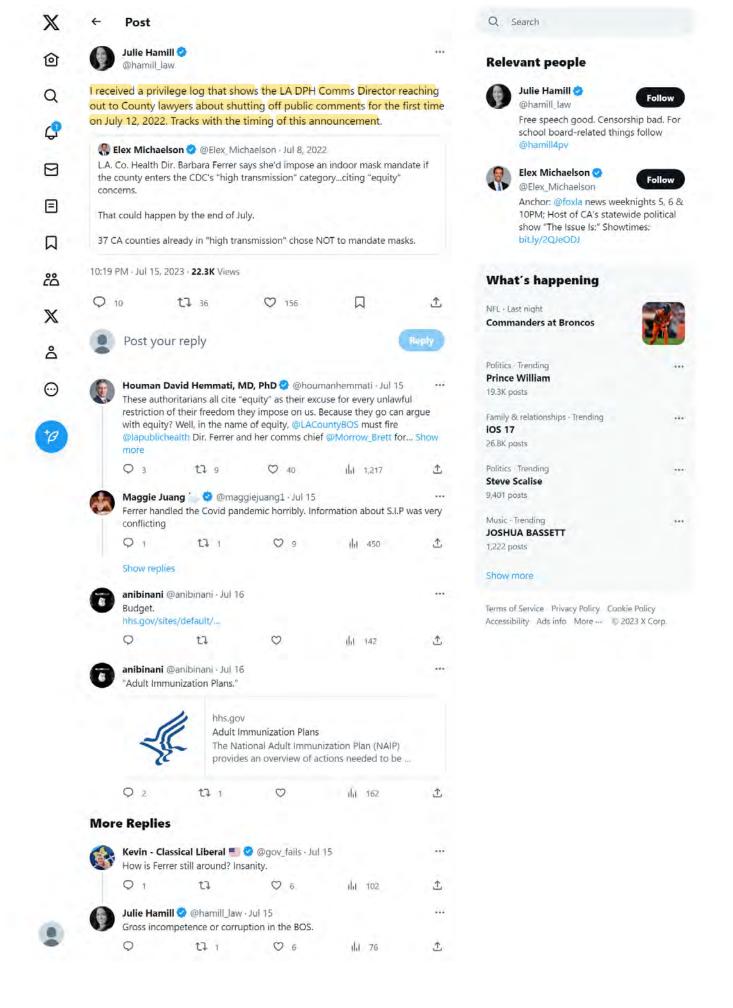
Document title: (1) Julie Hamill on X: "Final note here: I'm noticing a trend, where law firm employees (rather than practicing partners/associates) are tossed out as sacrificial lambs to defend unethical behavior. The ends justify the means. It's not just the firm in the news right now." / X Capture URL: https://twitter.com/hamill_law/status/1684224323291328513 Page loaded at (UTC): Mon, 18 Sep 2023 19:35:41 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 19:36:16 GMT Capture tool: 10.29.2 54.157.181.49 Collection server IP: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 3 Capture ID: cdTcVahV3fRYs18zj8Bc3o User: sm-lchu PDF REFERENCE #: izpvpPcVJFtq4SGiTMPBKw

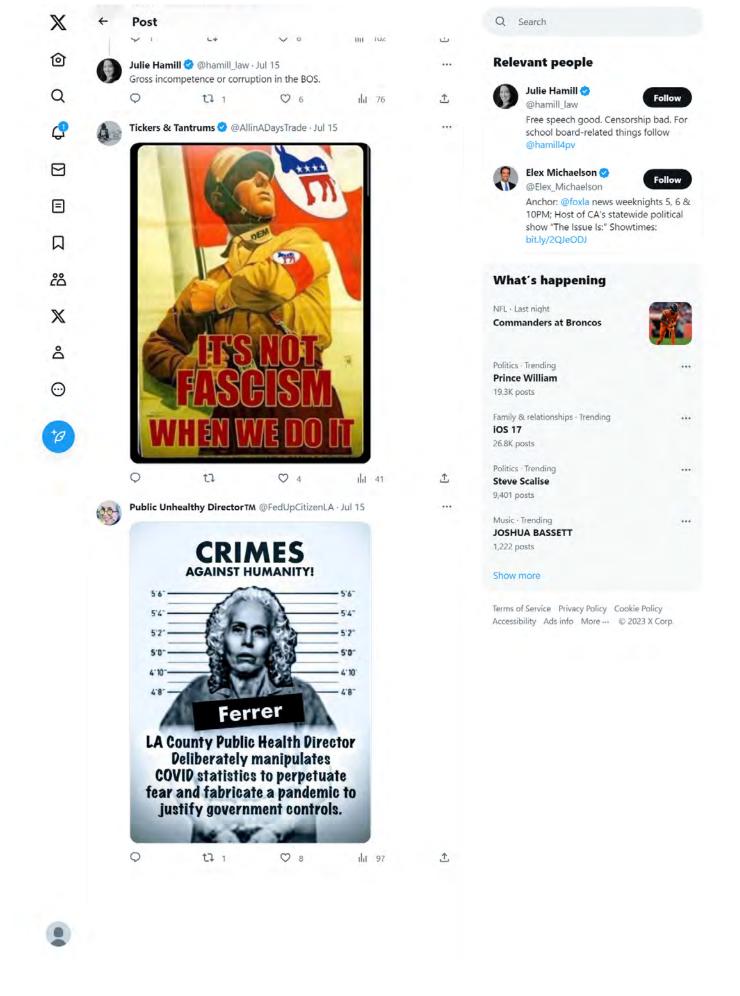




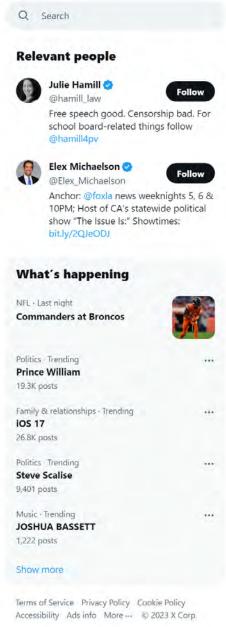


Document title:	(1) Julie Hamill on X: "I received a privilege log that shows the LA DPH Comms Director reaching out to County lawyers about shutting off public comments for the first time on July 12, 2022. Tracks with the timing of this announcement." / X
Capture URL:	https://twitter.com/hamill_law/status/1680341350817107969
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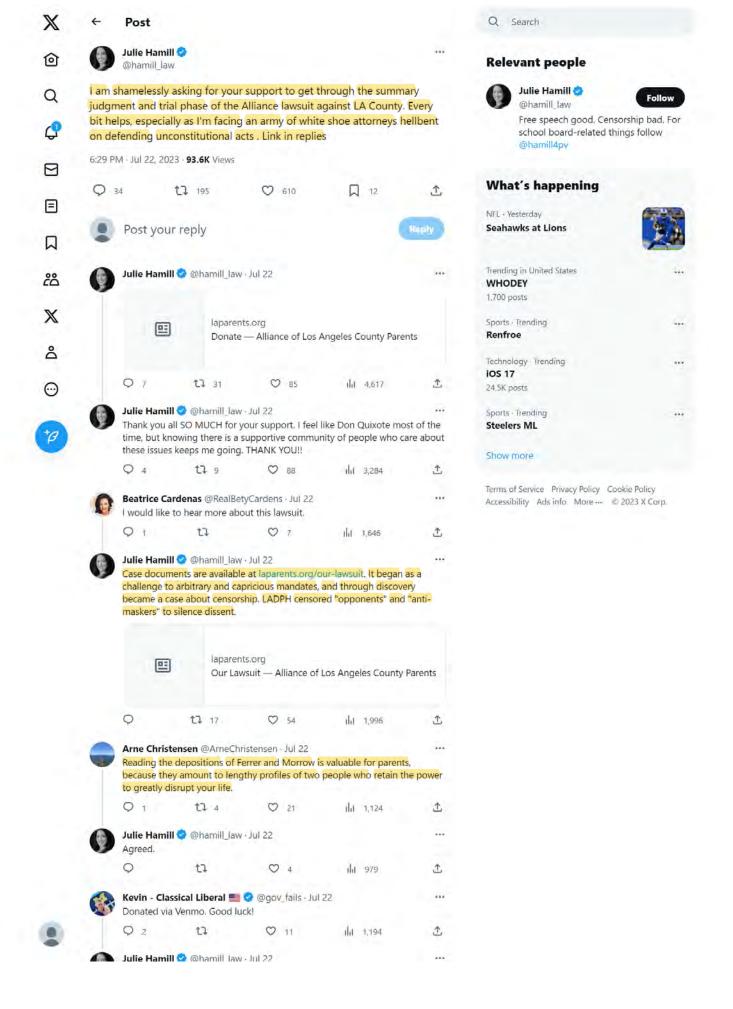


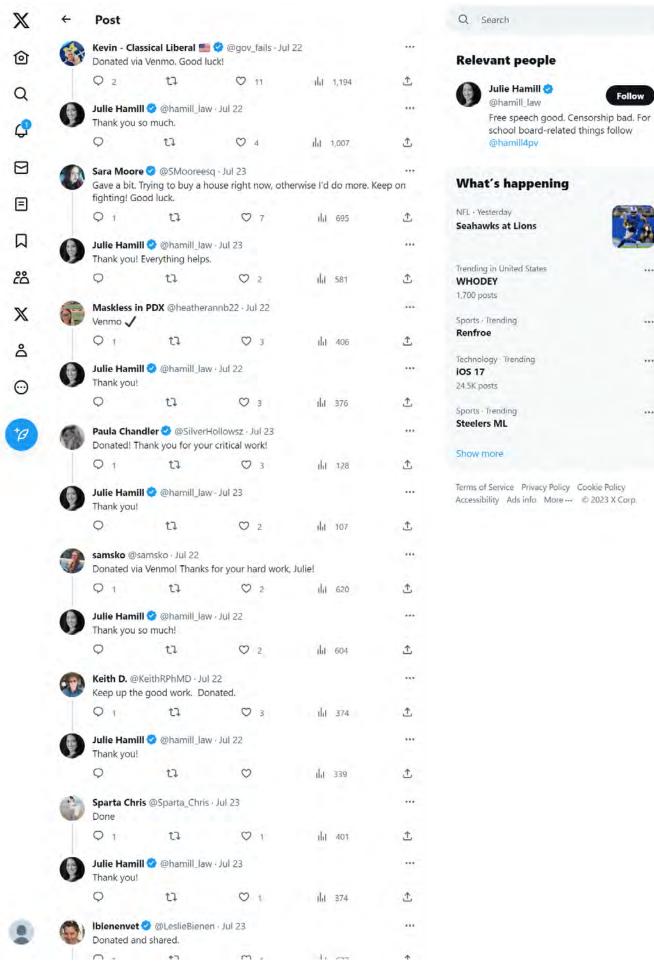




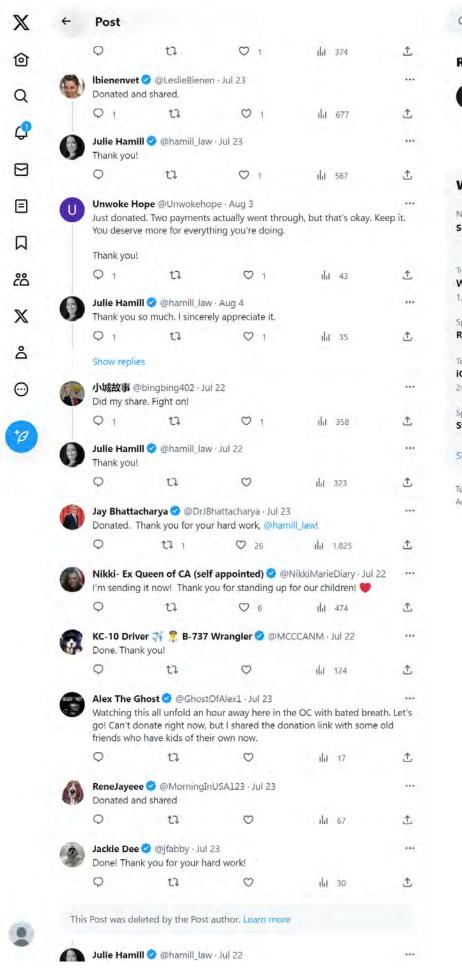


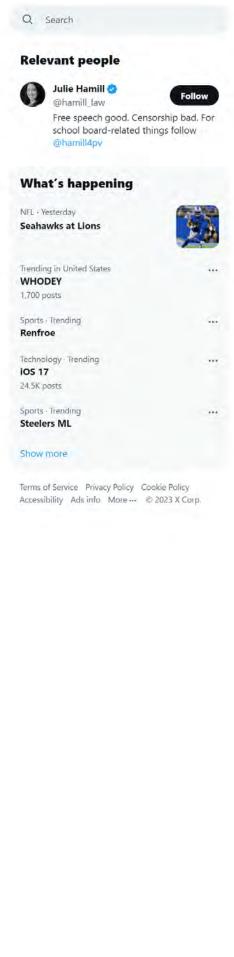
Document title: (1) Julie Hamill on X: "I am shamelessly asking for your support to get through the summary judgment and trial phase of the Alliance lawsuit against LA County. Every bit helps, especially as I'm facing an army of white shoe attorneys hellbent on defending unconstitutional acts . Link in replies" / X Capture URL: https://twitter.com/hamill_law/status/1682820186670235650 Page loaded at (UTC): Mon, 18 Sep 2023 19:37:00 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 19:38:24 GMT Capture tool: 10.29.2 54.157.181.49 Collection server IP: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) 8 PDF length: Capture ID: idaSbpwVLD5TWERU9yWs9u User: sm-lchu PDF REFERENCE #: 7XpwPu8Xwza5E7VLSo2fUR _

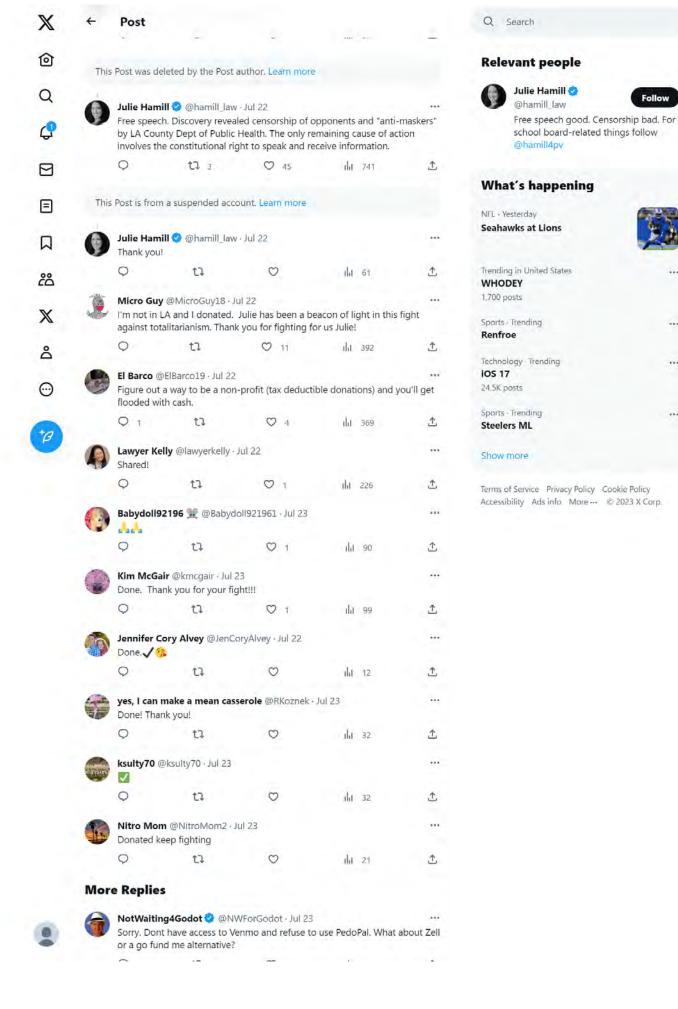




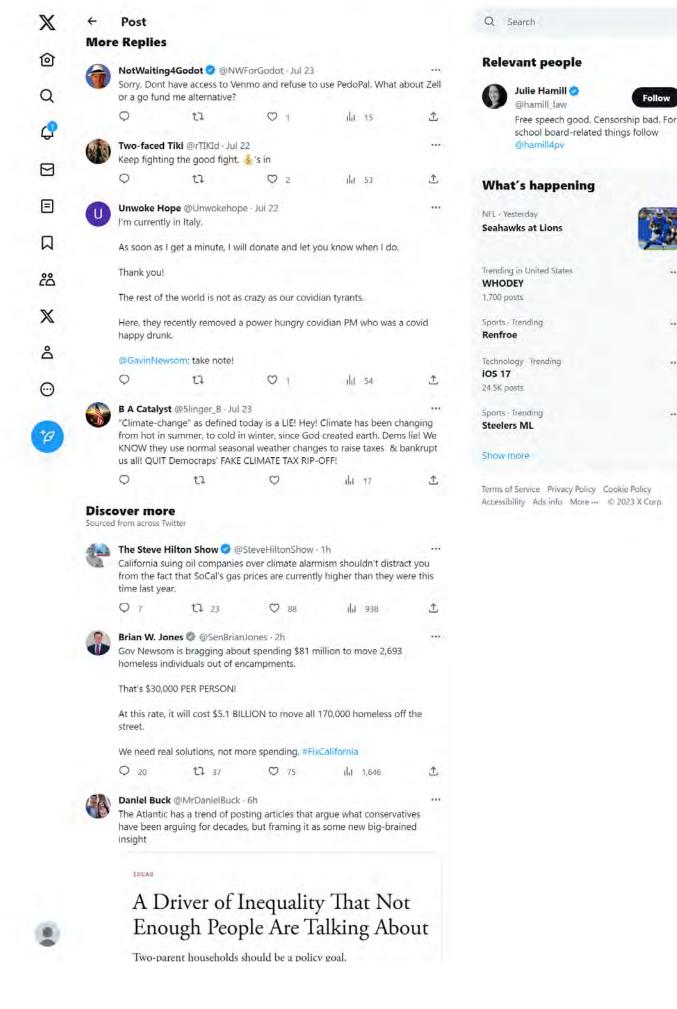
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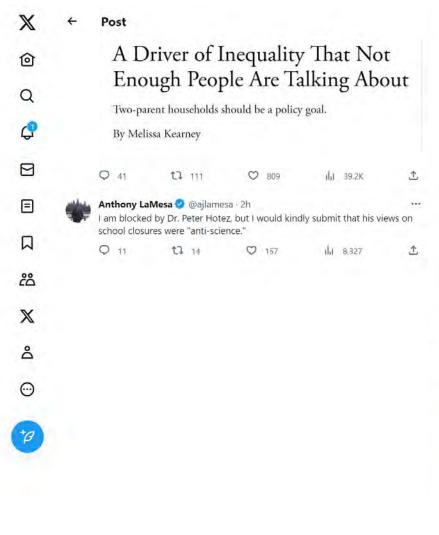




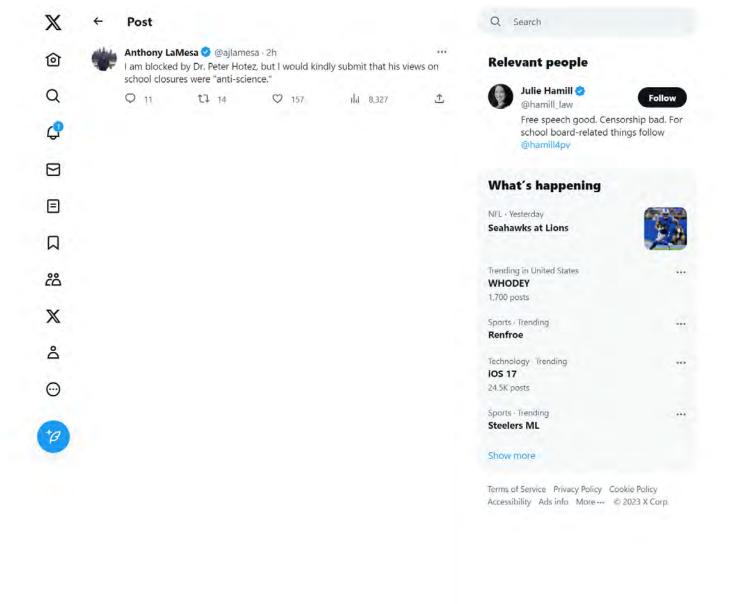


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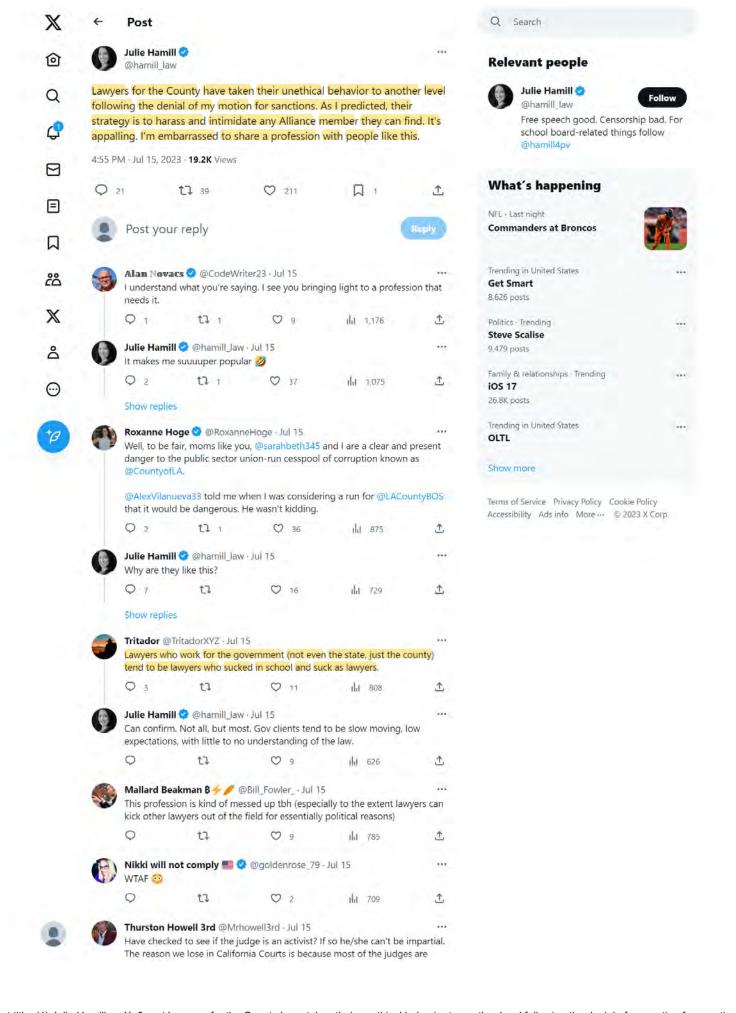


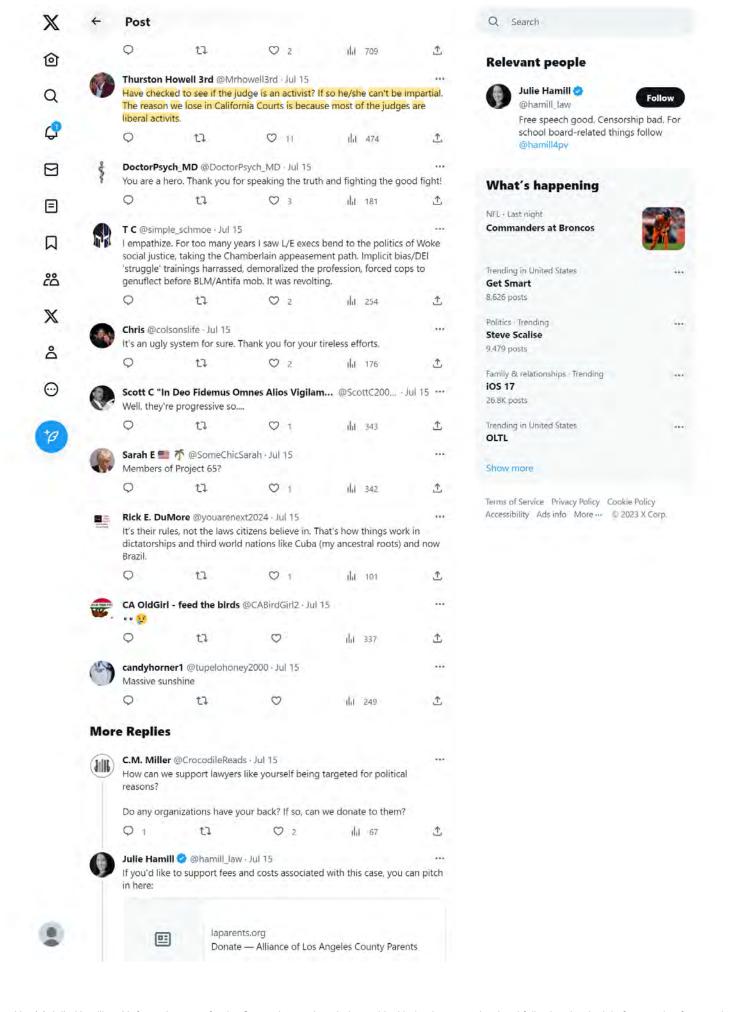


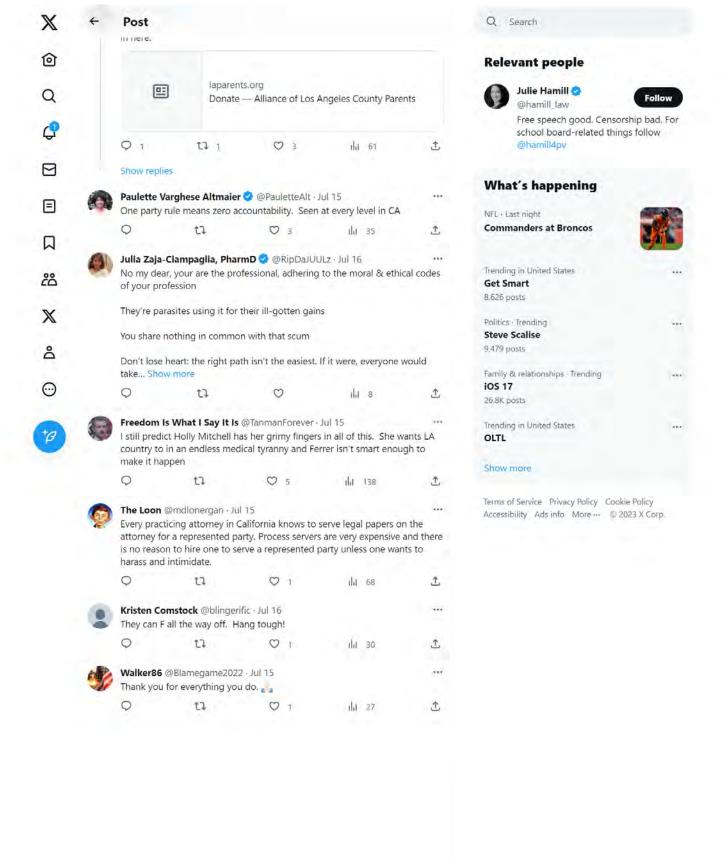


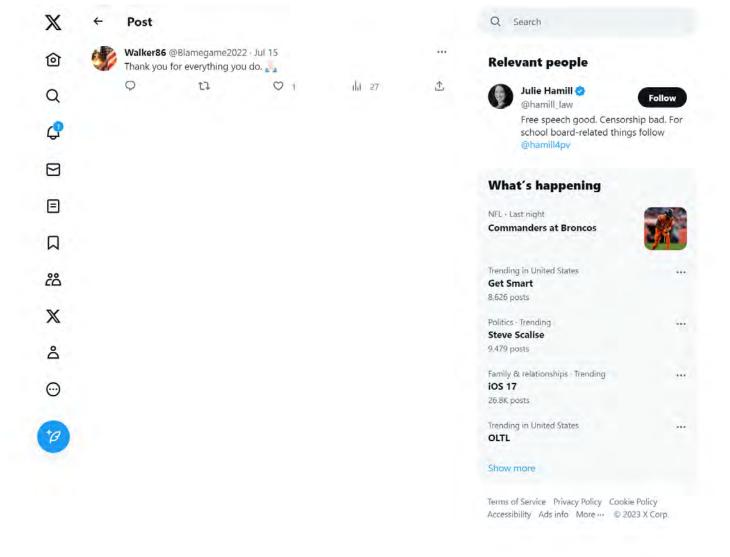


Document title: (1) Julie Hamill on X: "Lawyers for the County have taken their unethical behavior to another level following the denial of my motion for sanctions. As I predicted, their strategy is to harass and intimidate any Alliance member they can find. It's appalling. I'm embarrassed to share a profession with..." / X Capture URL: https://twitter.com/hamill_law/status/1680259905738149888 Page loaded at (UTC): Mon, 18 Sep 2023 20:06:34 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 20:07:27 GMT Capture tool: 10.29.2 54.157.181.49 Collection server IP: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 5 Capture ID: 2QQqMQVLYjWXQNgiyEKXC7 User: sm-lchu PDF REFERENCE #: pK9LNBWf19uCkFwUGdk5ZZ



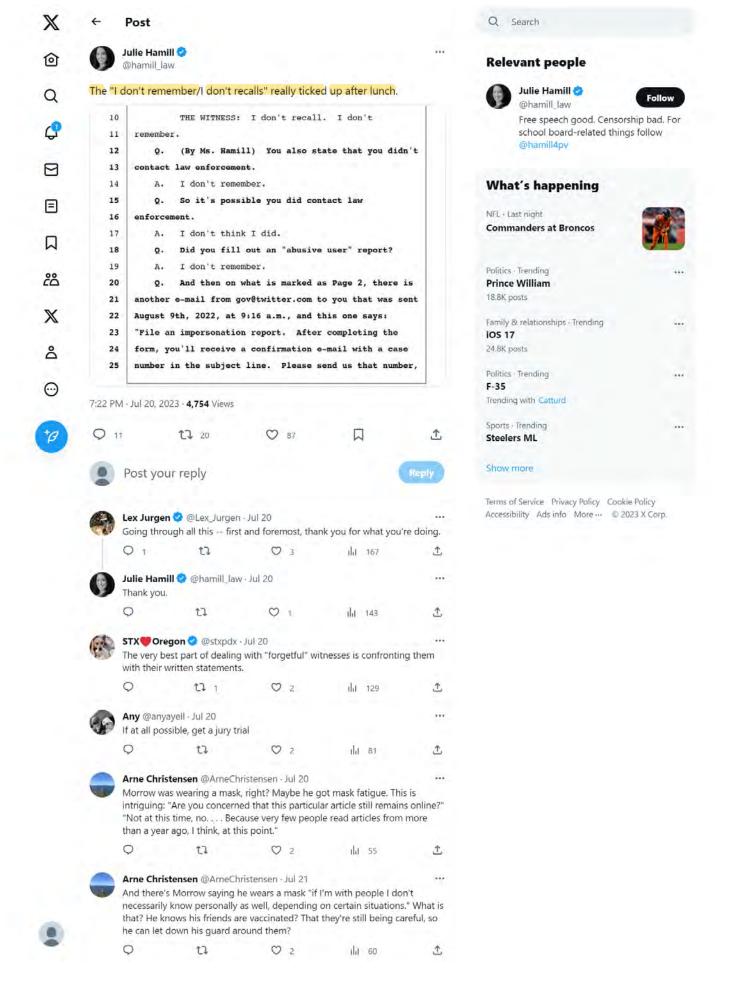


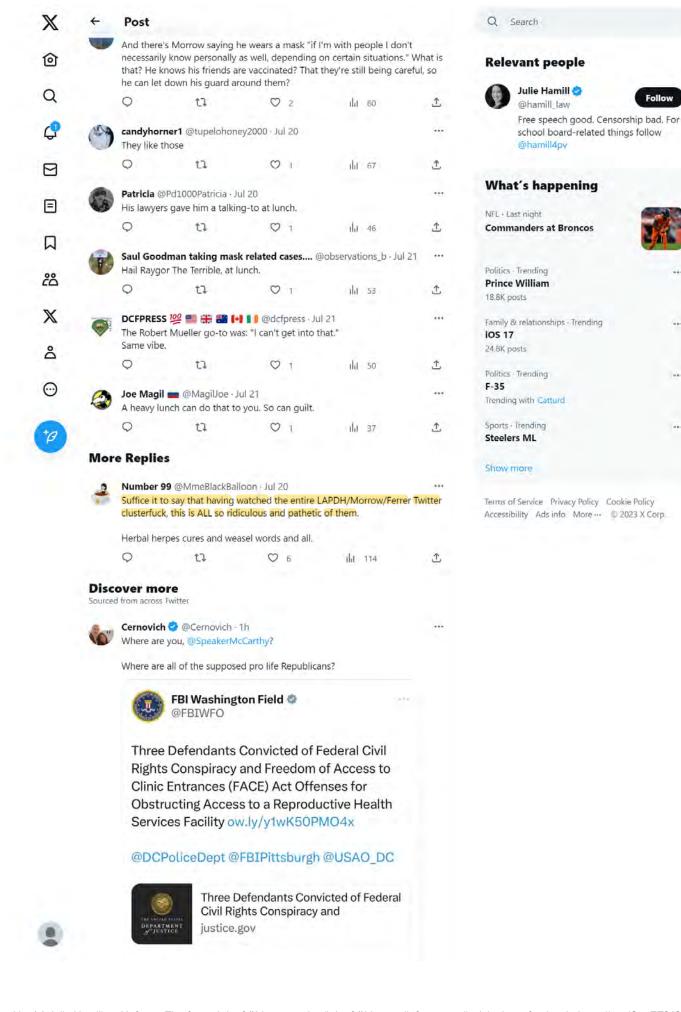


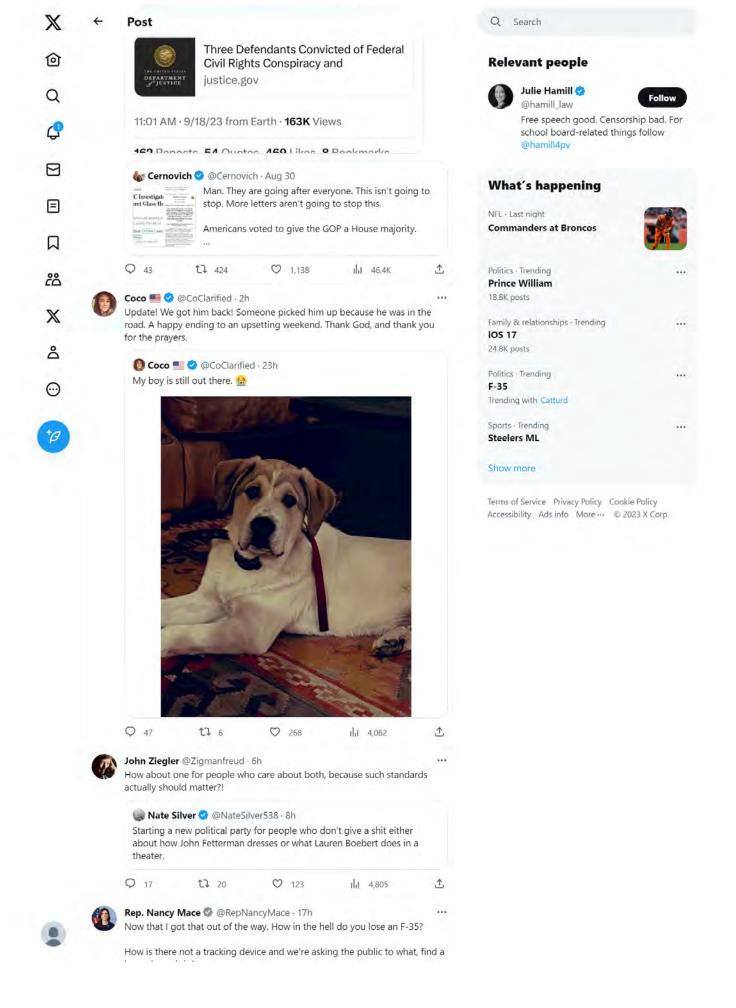


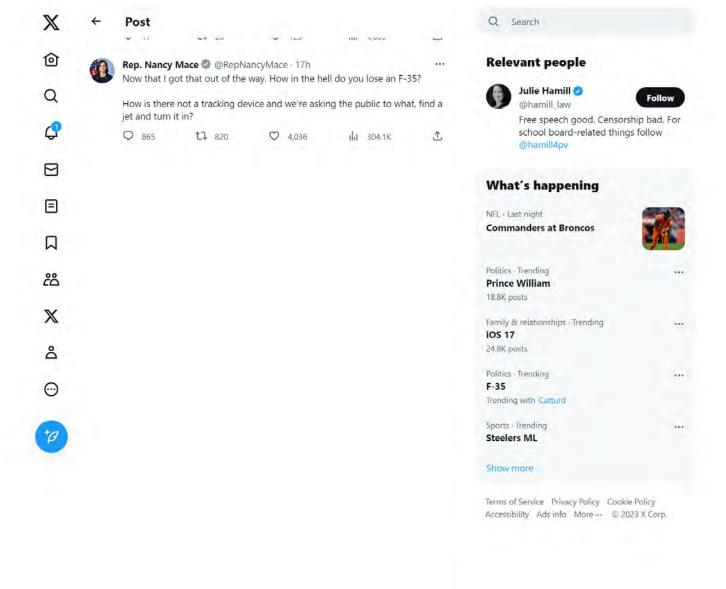


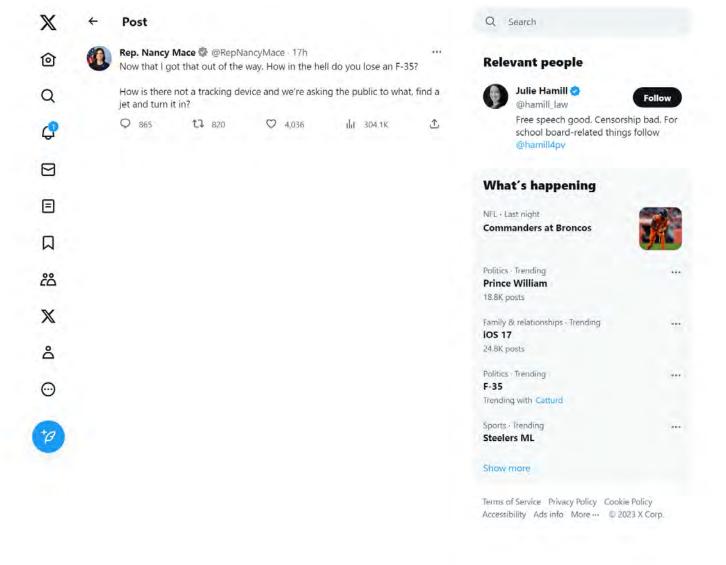
Document title: (1) Julie Hamill on X: "The "I don't remember/I don't recalls" really ticked up after lunch. https://t.co/QqqETfYCt2" / X Capture URL: https://twitter.com/hamill_law/status/1682108770967756800 Page loaded at (UTC): Mon, 18 Sep 2023 19:38:54 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 19:39:50 GMT Capture tool: 10.29.2 Collection server IP: 54.157.181.49 Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Windows_NT (Node 16.17.1) Operating system: PDF length: 6 Capture ID: wjn WUbTkwwk PZgok 9LZiNhUser: sm-lchu PDF REFERENCE #: pY8W8ymcukDwwnsNyRWkQU





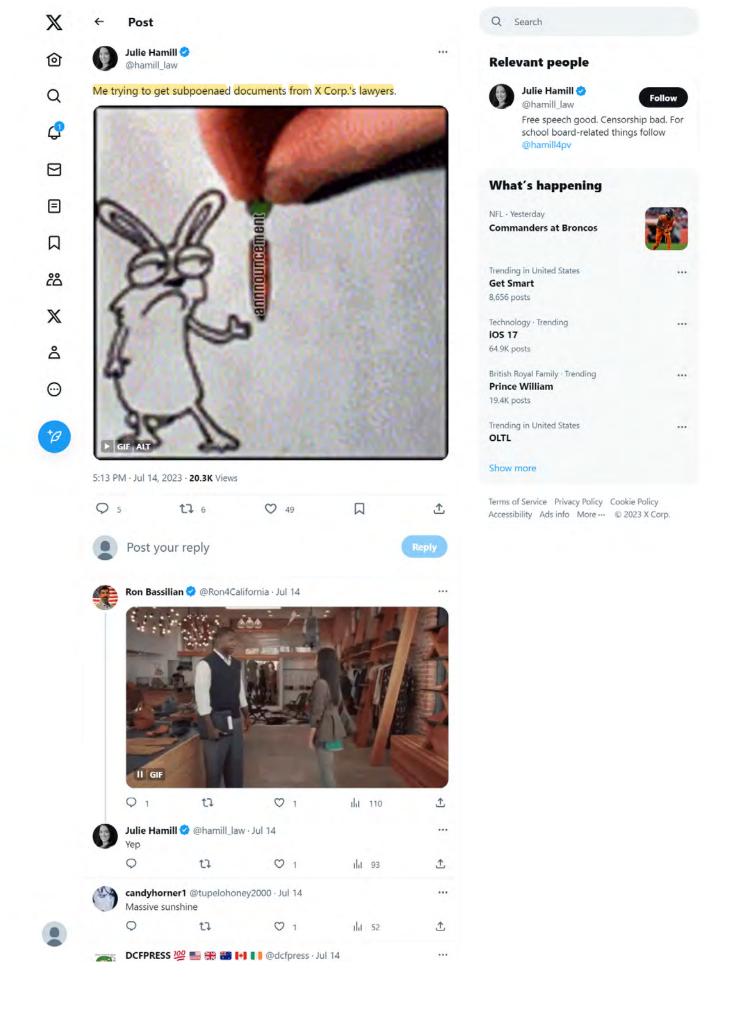


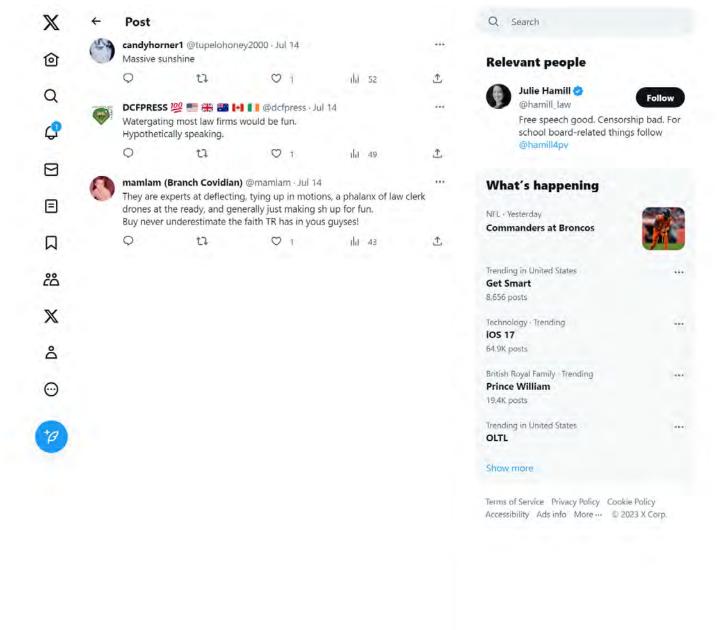


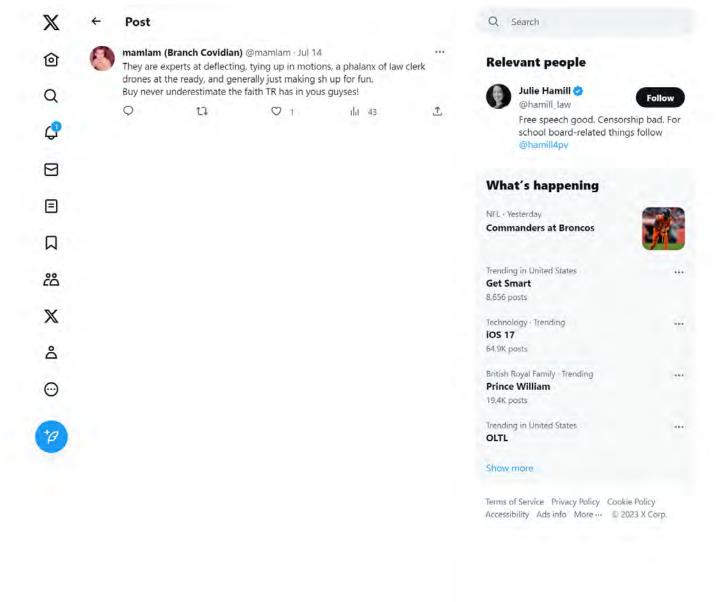




Document title: (1) Julie Hamill on X: "Me trying to get subpoenaed documents from X Corp.'s lawyers. https://t.co/Sdk9ZP98kl" / X Capture URL: https://twitter.com/hamill_law/status/1679901987557736448 Page loaded at (UTC): Mon, 18 Sep 2023 20:08:00 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 20:08:43 GMT Capture tool: 10.29.2 Collection server IP: 54.157.181.49 Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Windows_NT (Node 16.17.1) Operating system: PDF length: 4 Capture ID: msbU2QYkAiWxu2bFEfAkb6 User: sm-lchu jV95KJiDAtz4Vdmh9FoZKS ____ PDF REFERENCE #:

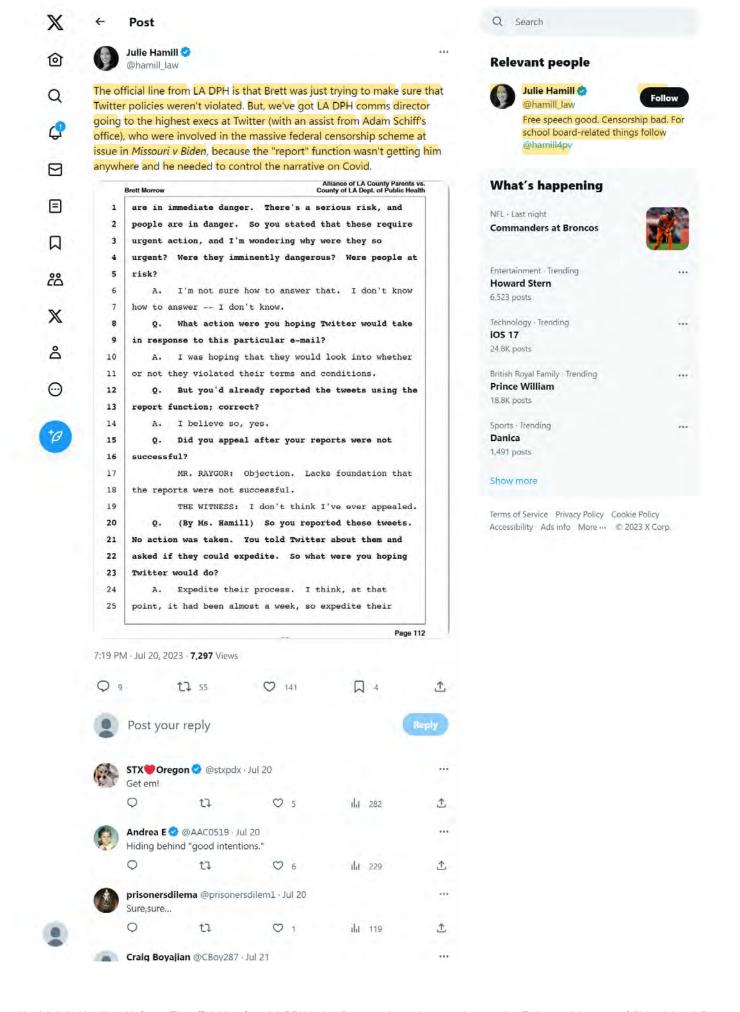


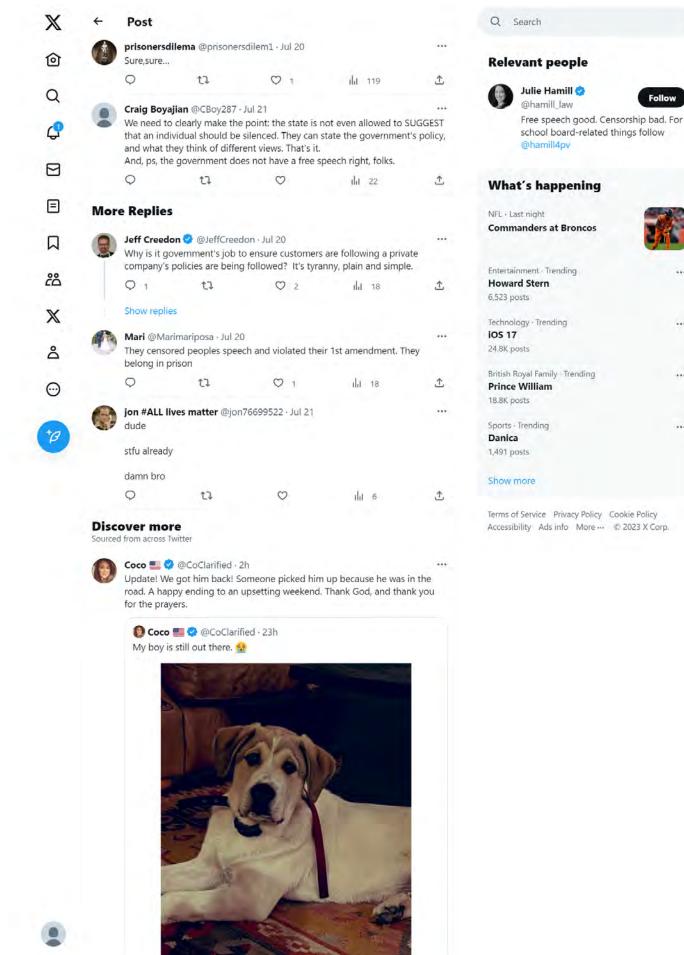






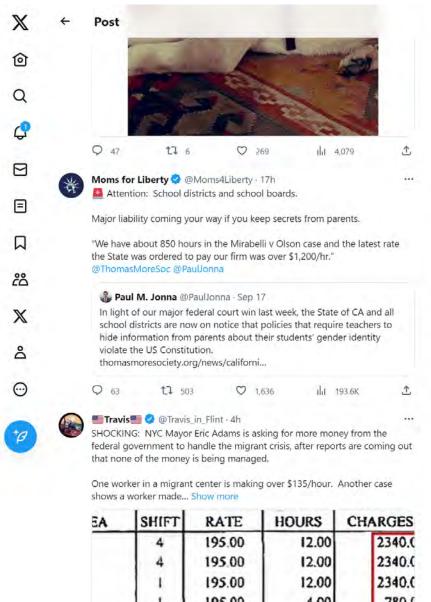
Document title: (1) Julie Hamill on X: "The official line from LA DPH is that Brett was just trying to make sure that Twitter policies weren't violated. But, we've got LA DPH comms director going to the highest execs at Twitter (with an assist from Adam Schiff's office), who were involved in the massive federal... https://t.co/bJveOI1jyo" / X Capture URL: https://twitter.com/hamill_law/status/1682107897373925379 Page loaded at (UTC): Mon, 18 Sep 2023 19:40:01 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 19:40:50 GMT Capture tool: 10.29.2 54.157.181.49 Collection server IP: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 5 Capture ID: 5Qc1y3dhonihuXBhkXZbb1 User: sm-lchu PDF REFERENCE #: 26tSV7Jk4K97jPBDvXrW5J _





Document title: (1) Julie Hamill on X: " The official line from LA DPH is that Brett was just trying to make sure that Twitter policies weren ' t violated. But,... Capture URL: https://twitter.com/hamill_law/status/1682107897373925379

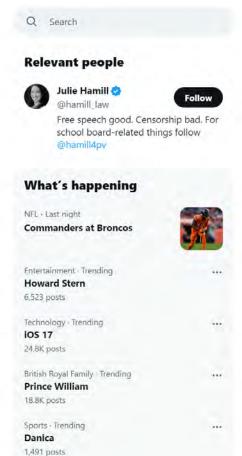
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	1	292.50	8.00	2340.0
	1	292.50	12.00	3510.0
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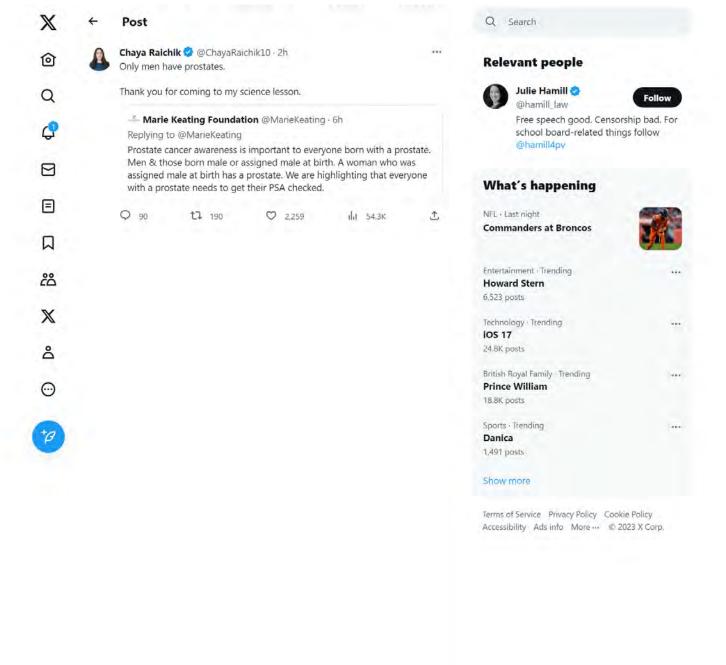


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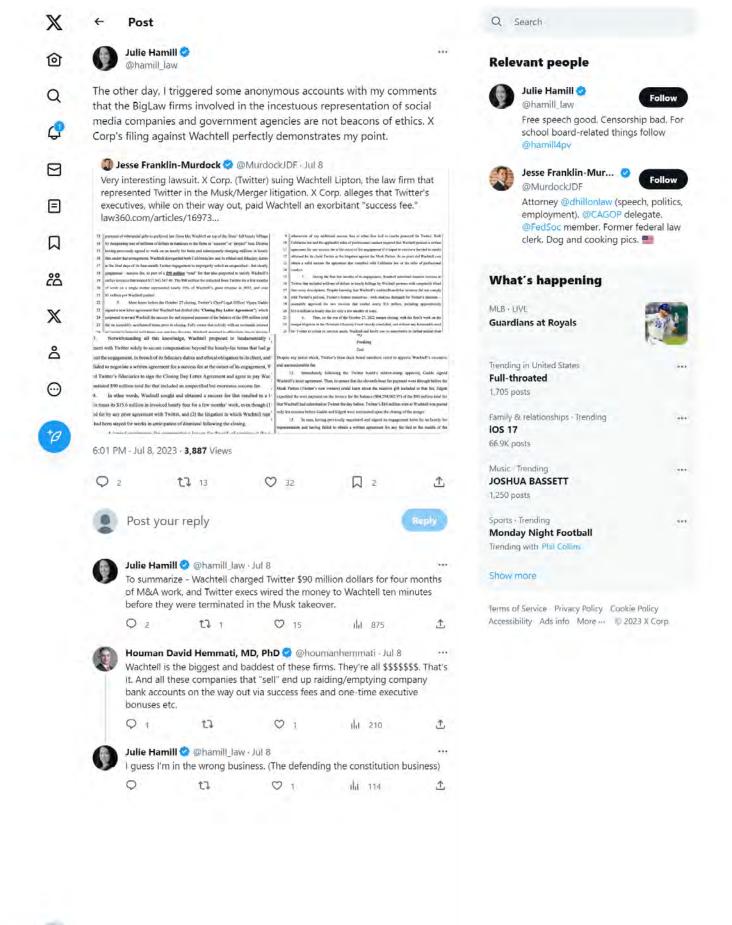


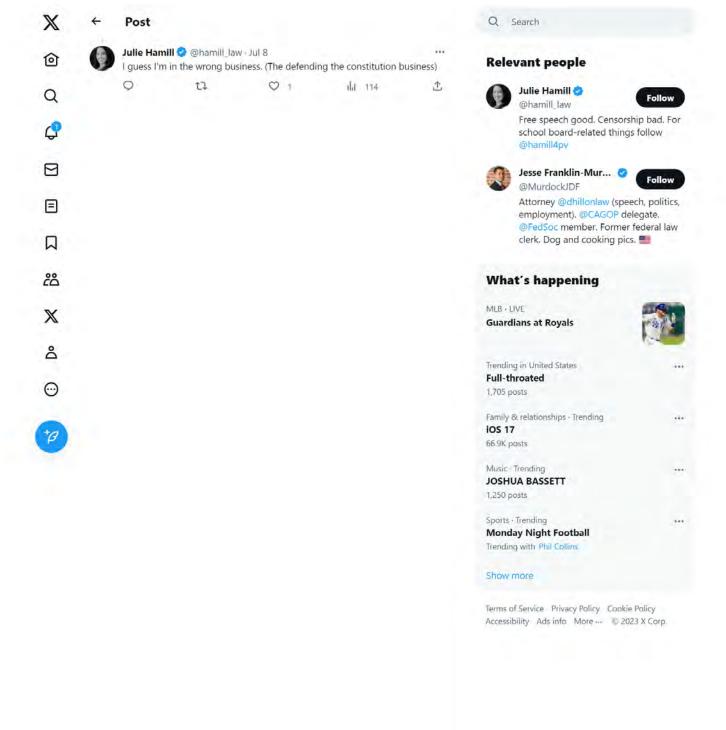


Document title: (1) Julie Hamill on X: "The other day, I triggered some anonymous accounts with my comments that the BigLaw firms involved in the incestuous representation of social media companies and government agencies are not beacons of ethics. X Corp's filing against Wachtell perfectly demonstrates my point." / X Capture URL: https://twitter.com/hamill_law/status/1677739820079271937 Page loaded at (UTC): Mon, 18 Sep 2023 20:19:27 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 20:20:01 GMT Capture tool: 10.29.2 Collection server IP: 54.157.181.49 Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 3 Capture ID: oazYuFfiLwpHMdn7Jfec6g User: sm-lchu

Exhibit B, Page 299

PDF REFERENCE #: oBd51K4ZLWNeM1Gnb3oAZr







Document title:

(1) Julie Hamill on X: "Here, we get to the part where the LA DPH comms director admits to emailing Lauren Culbertson, who was head of US public policy for Twitter at the time, for assistance dealing with "anti-maskers" and "opponents." He reached out to her via Patrick Boland, Adam Schiff's chief of... https://t.co/OK0bIPtIrf" / X

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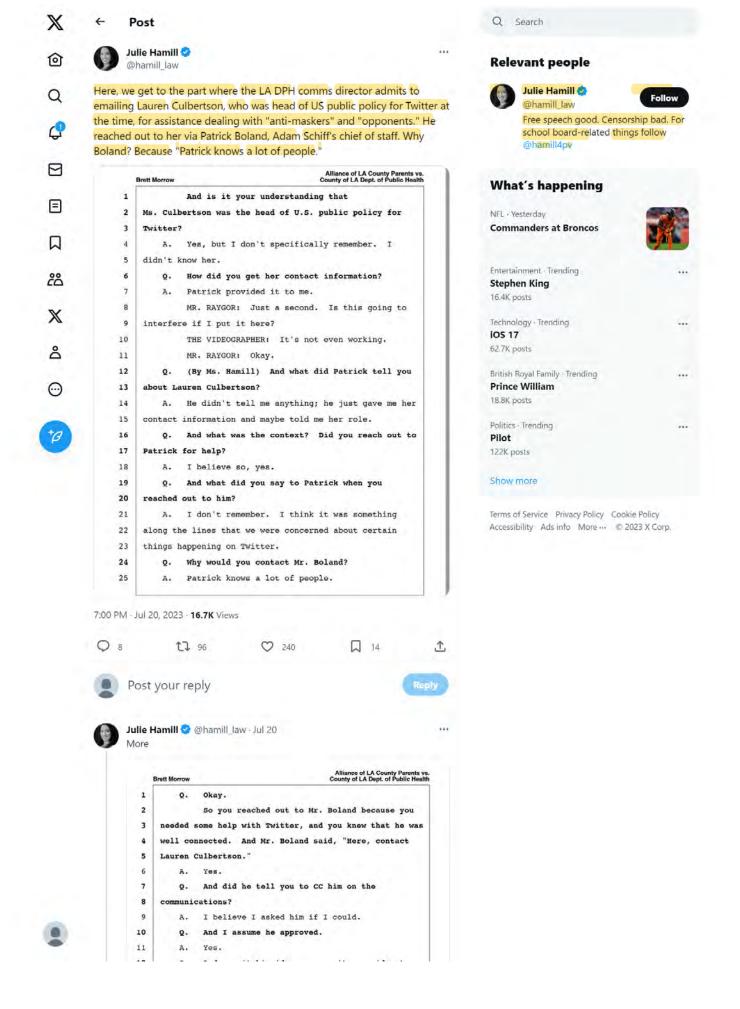
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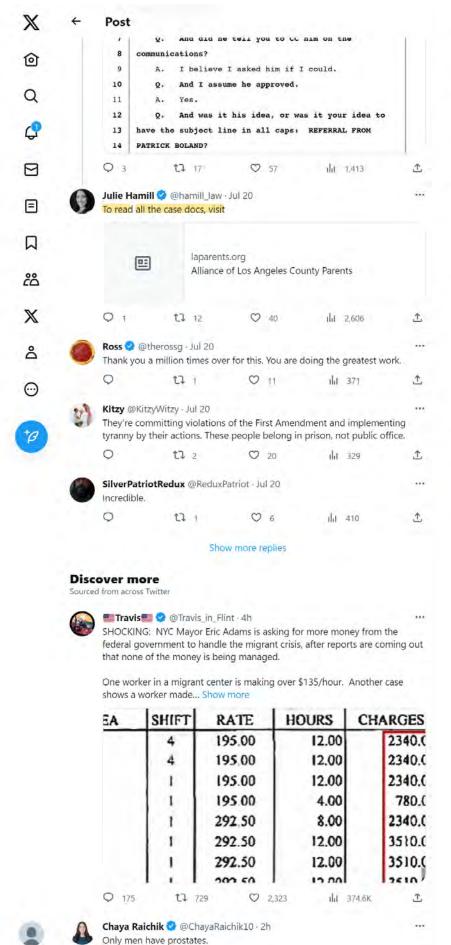
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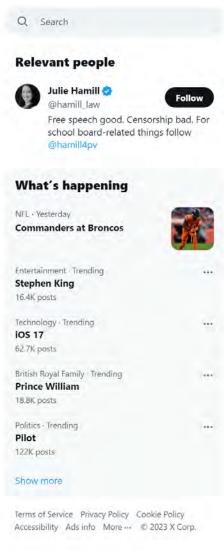
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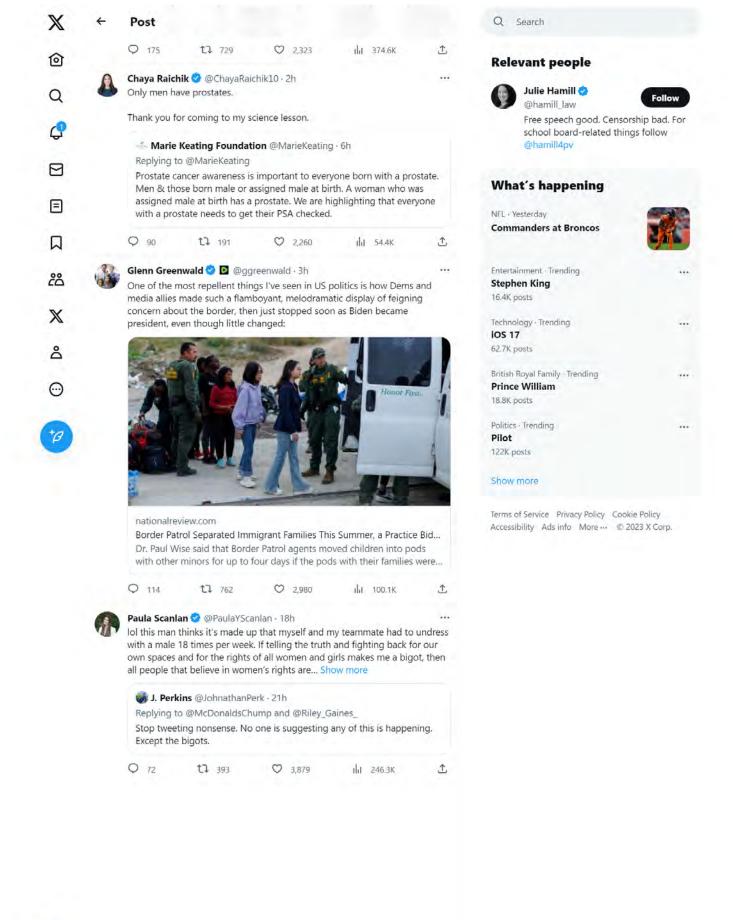
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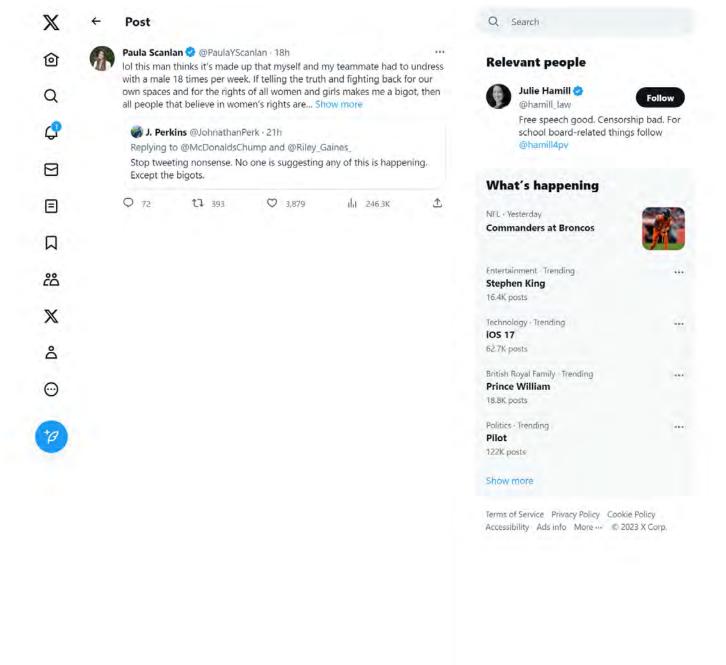
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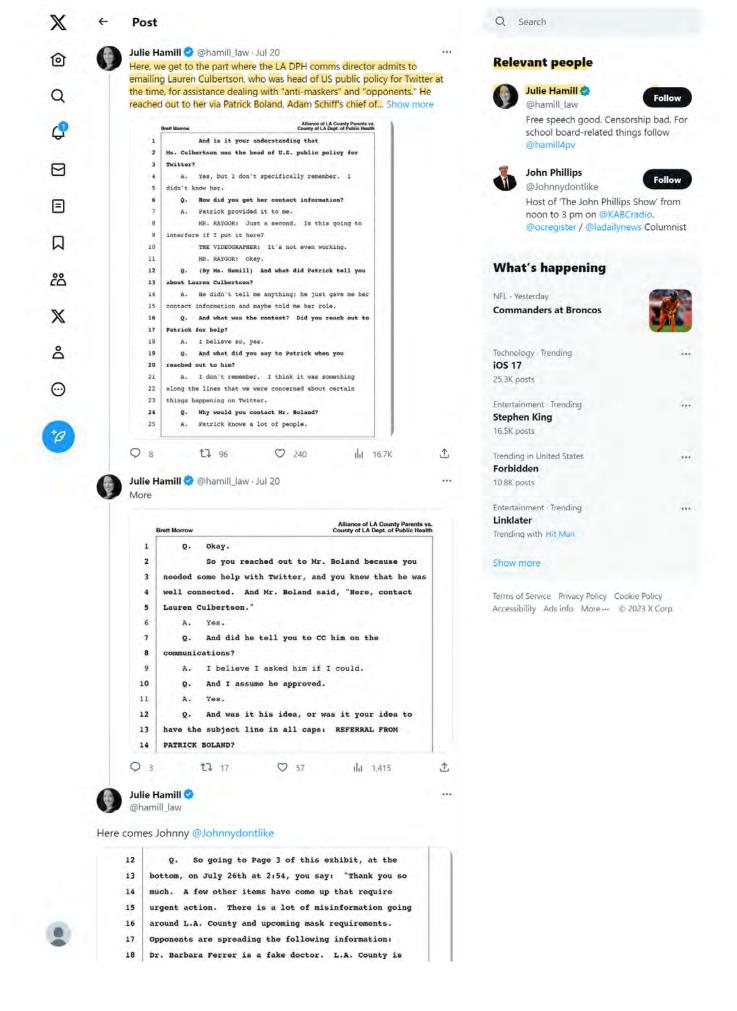


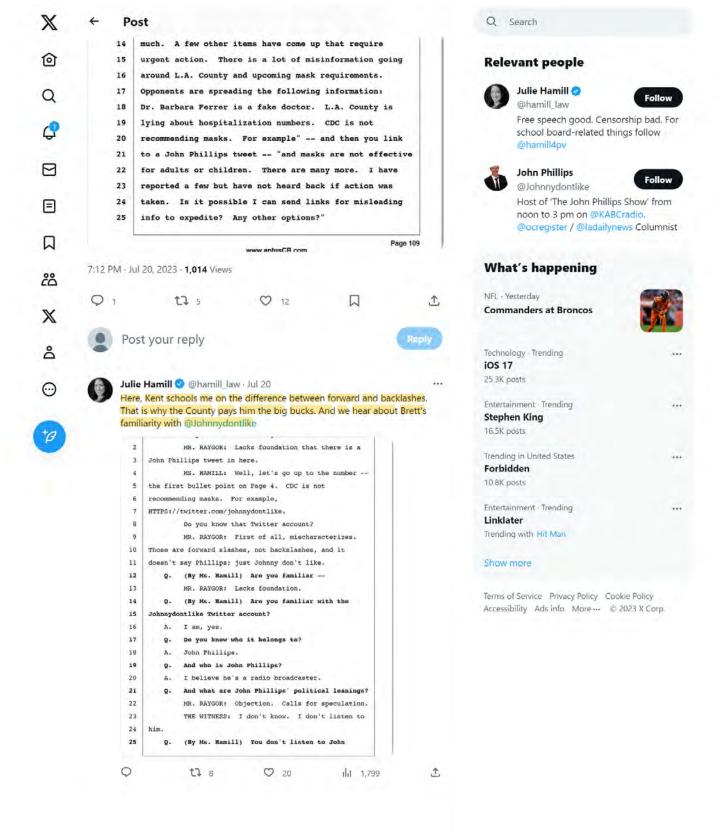


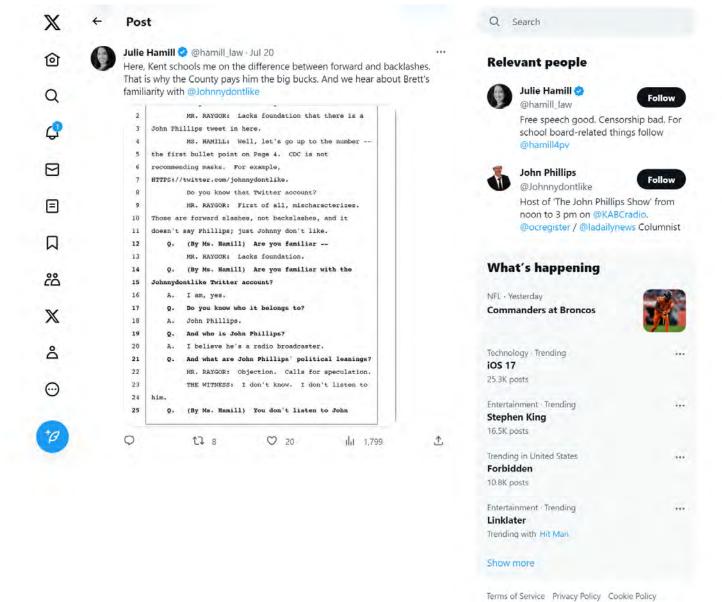




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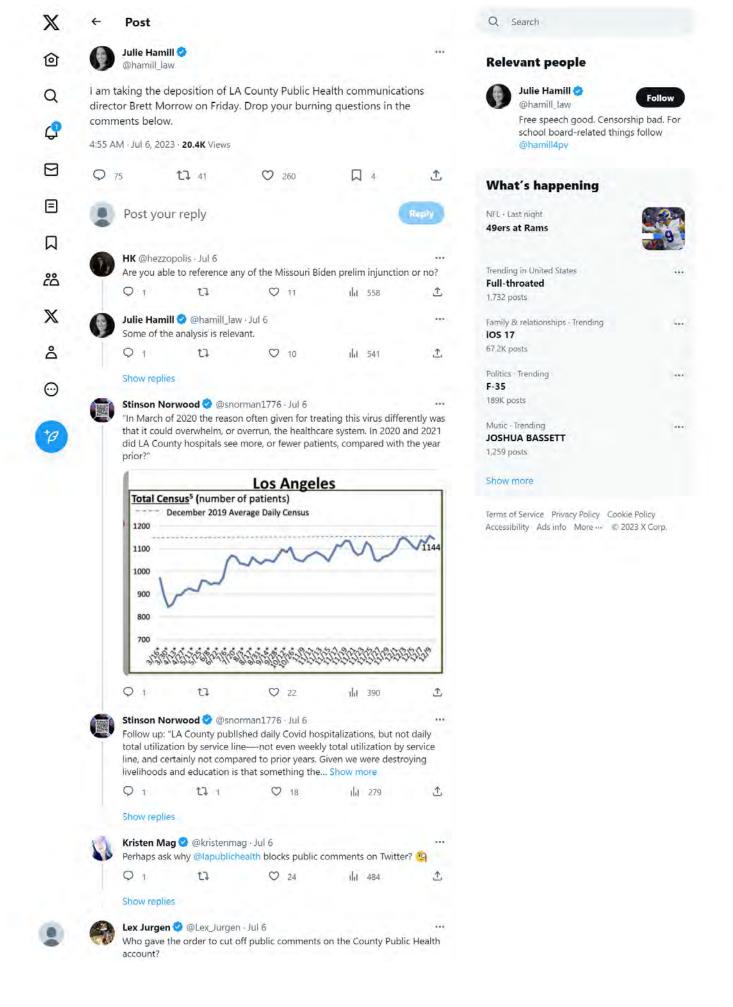


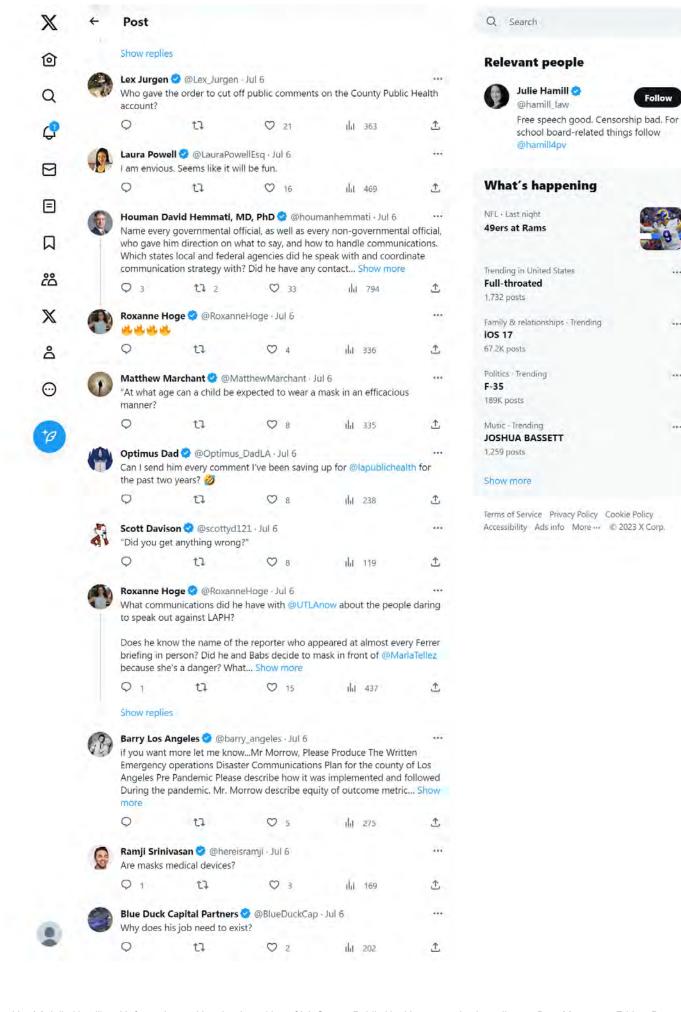


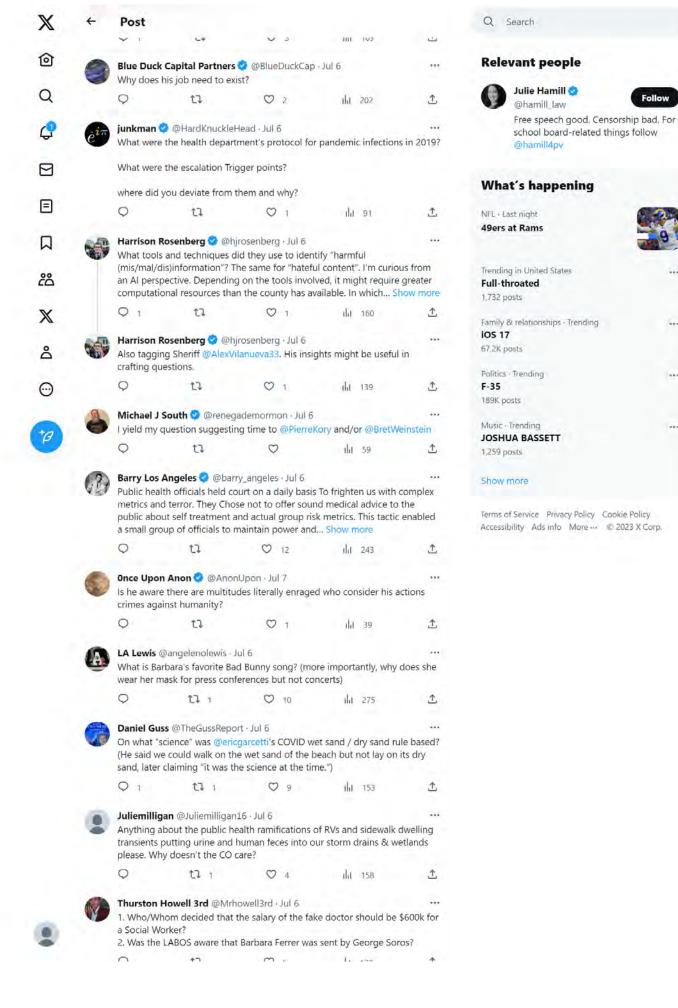
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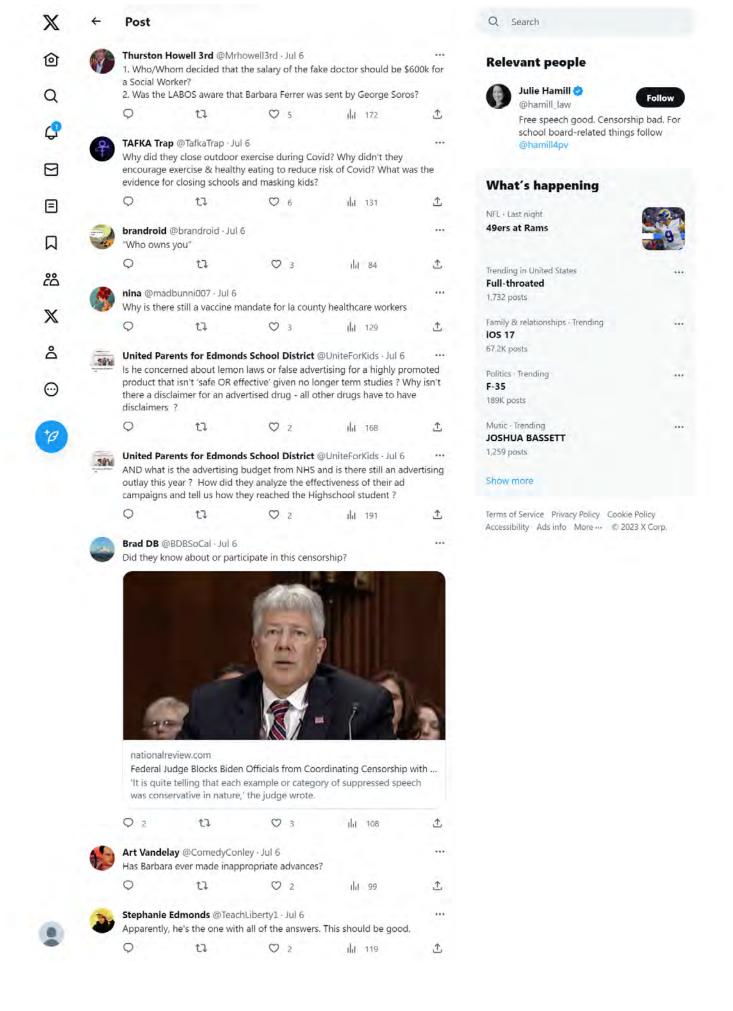


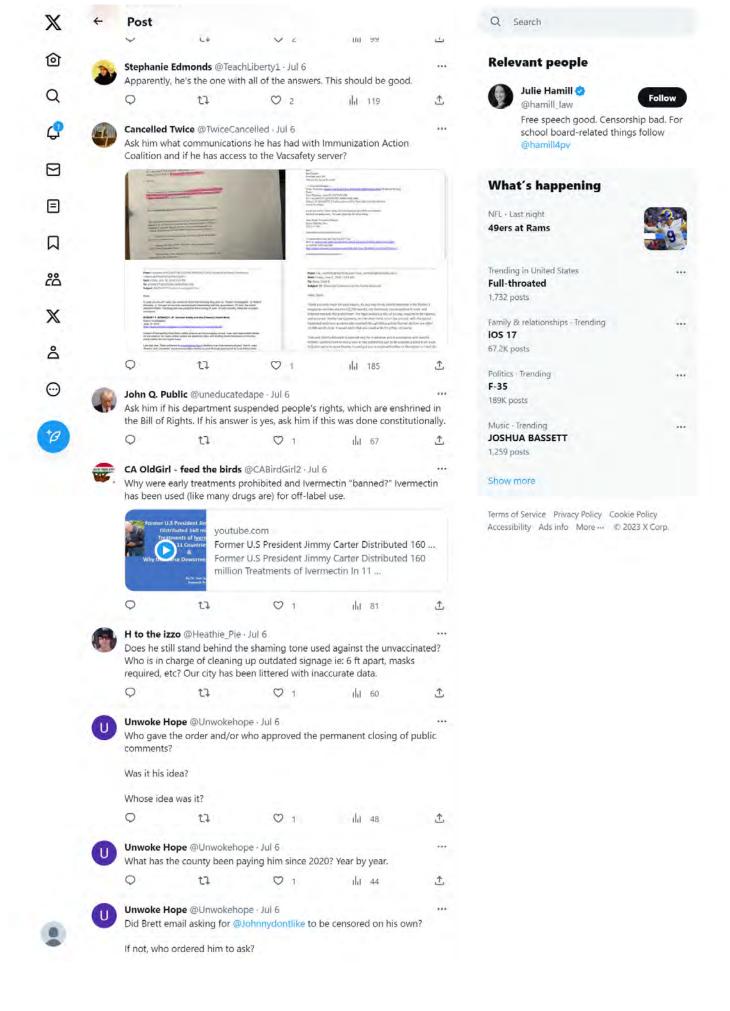
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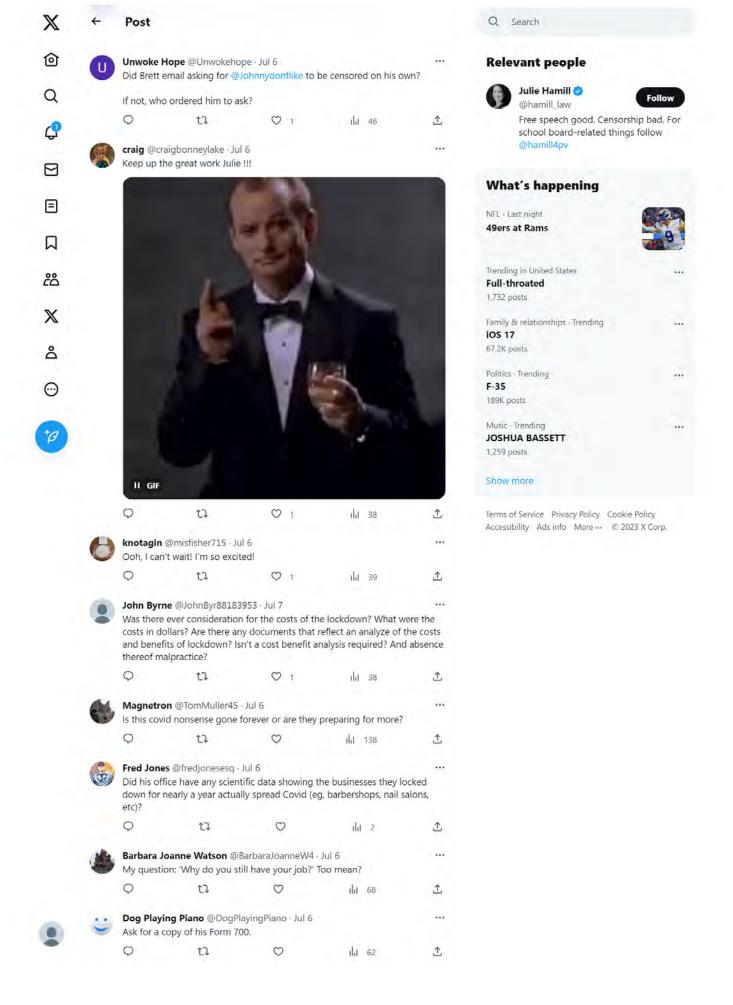


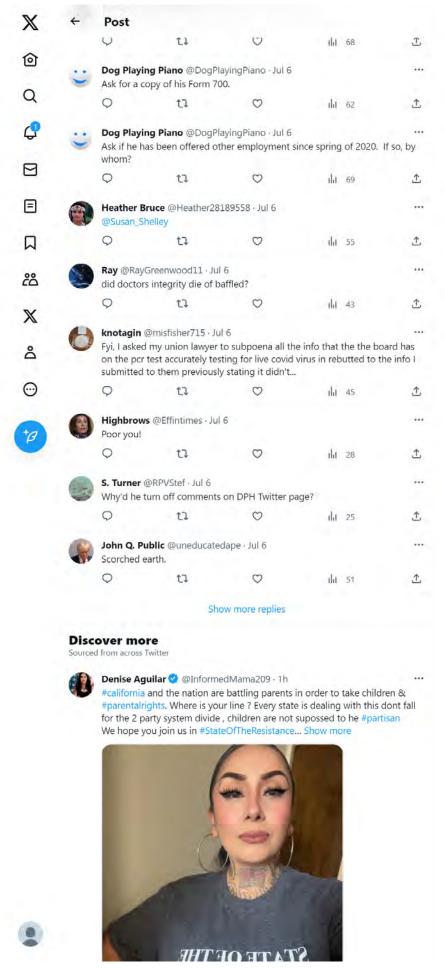


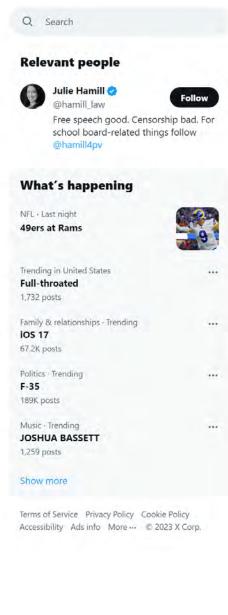


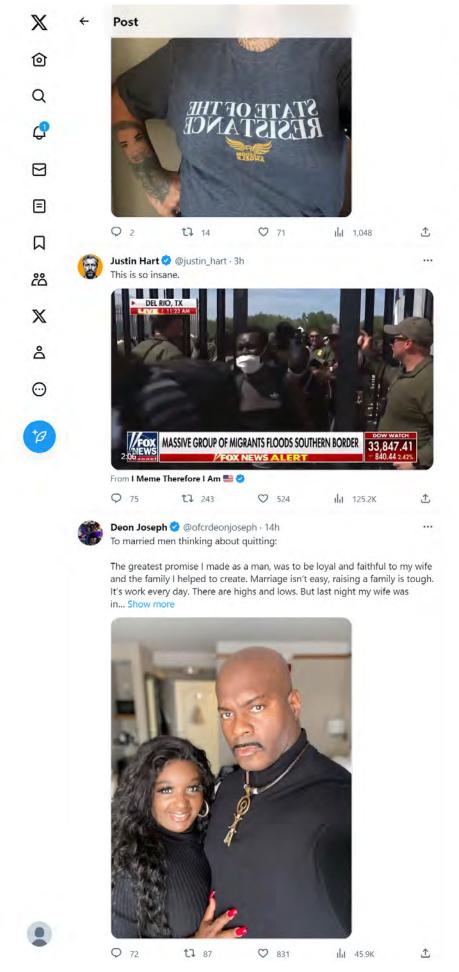




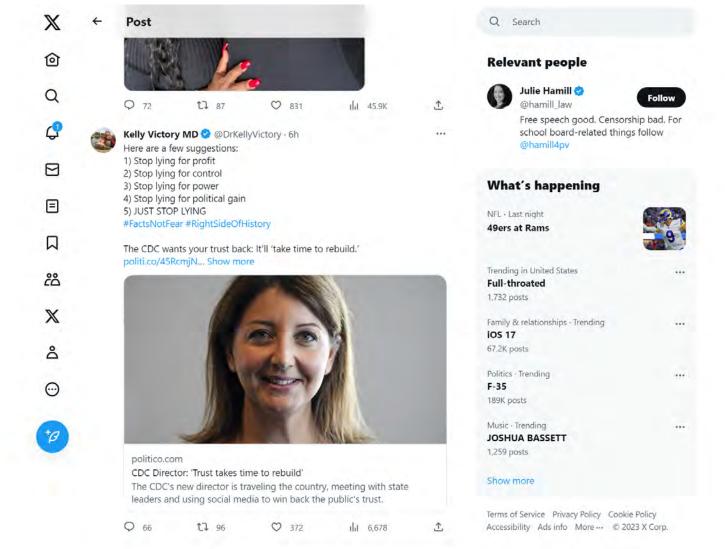


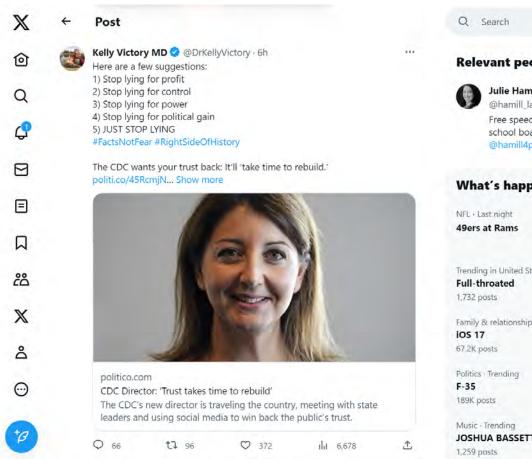


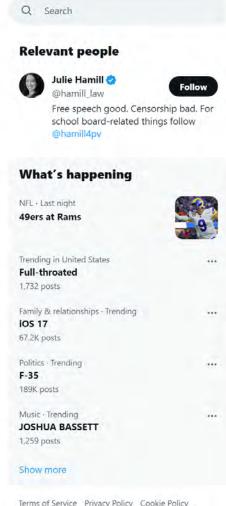












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Document title: (1) Julie Hamill on X: "Dear lawyers of twitter: @techjudge provided me with a very helpful chart to anticipate how the courts view legal analysis involving public health mandates. Wanted to share to help you focus your research. https://t.co/ptW9CkHFu2" / X

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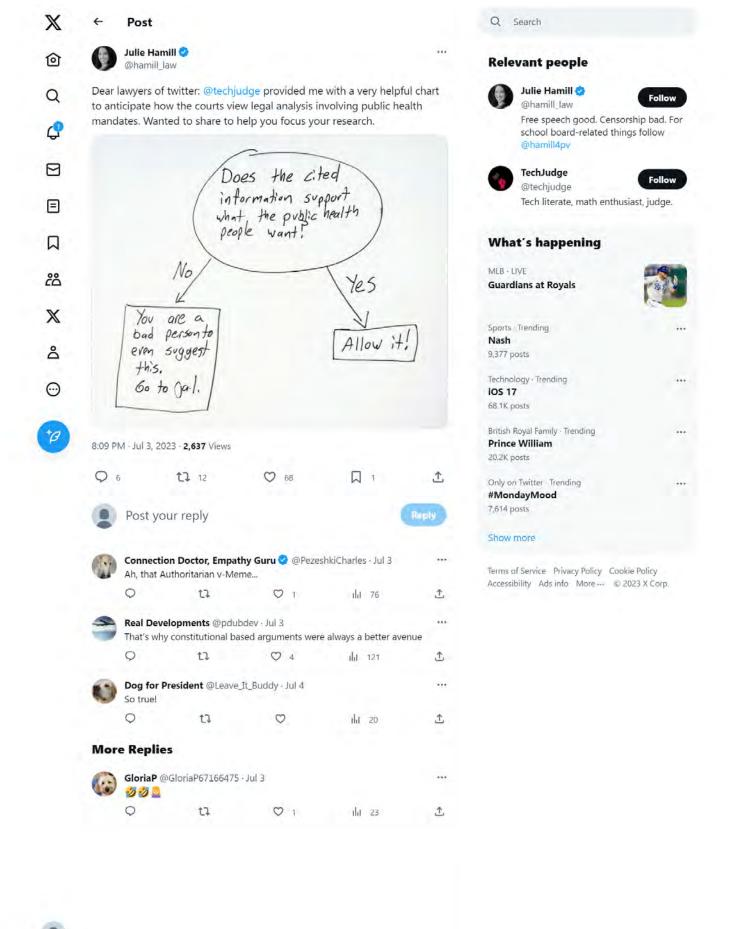
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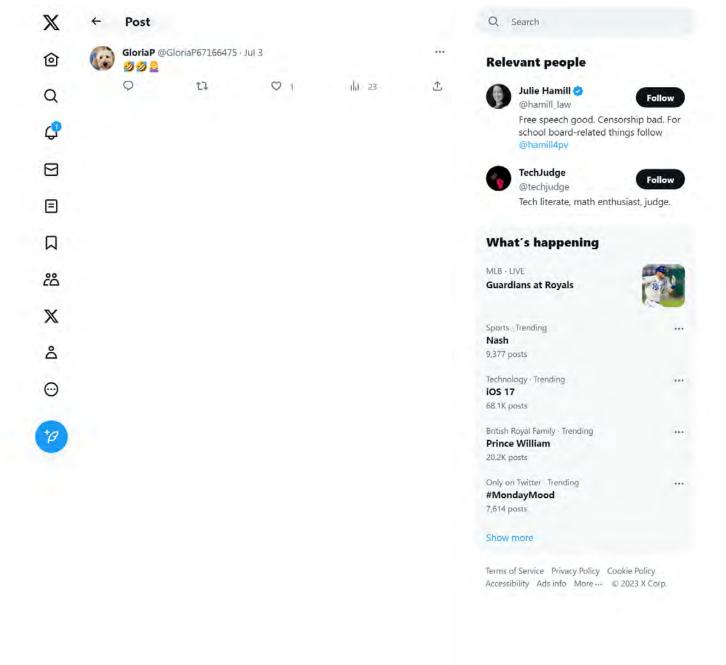
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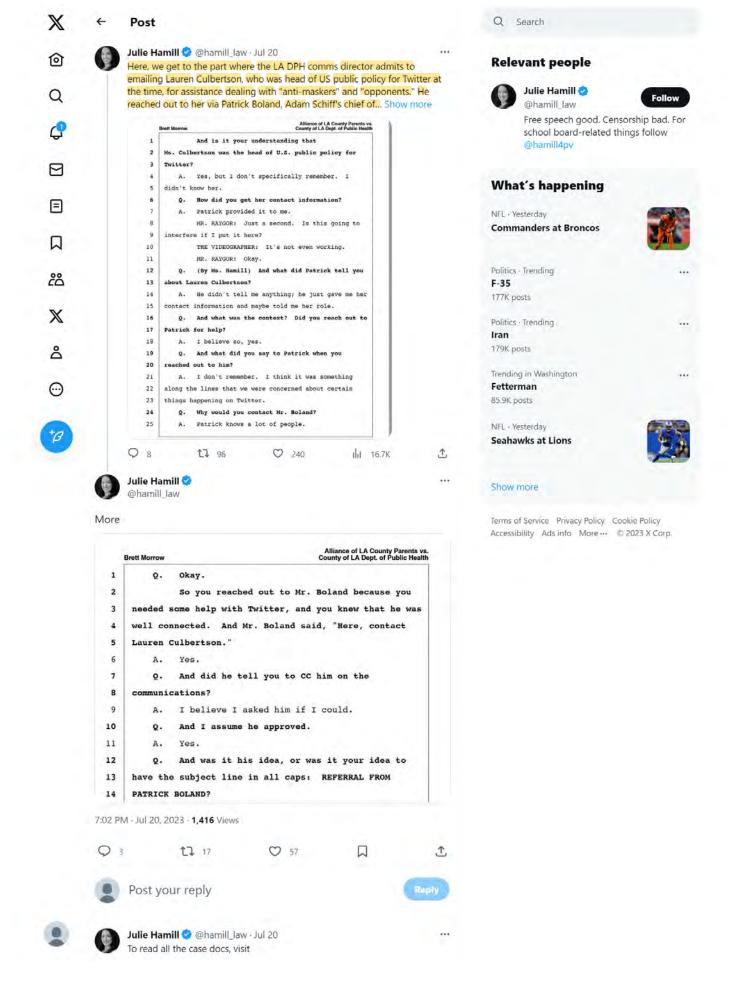
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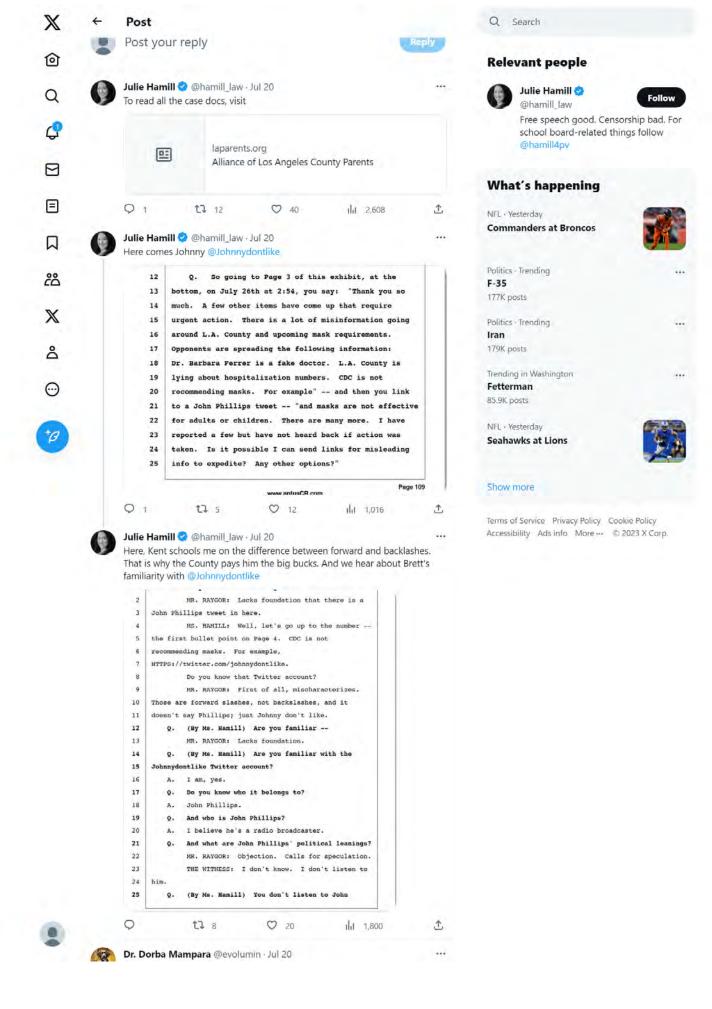


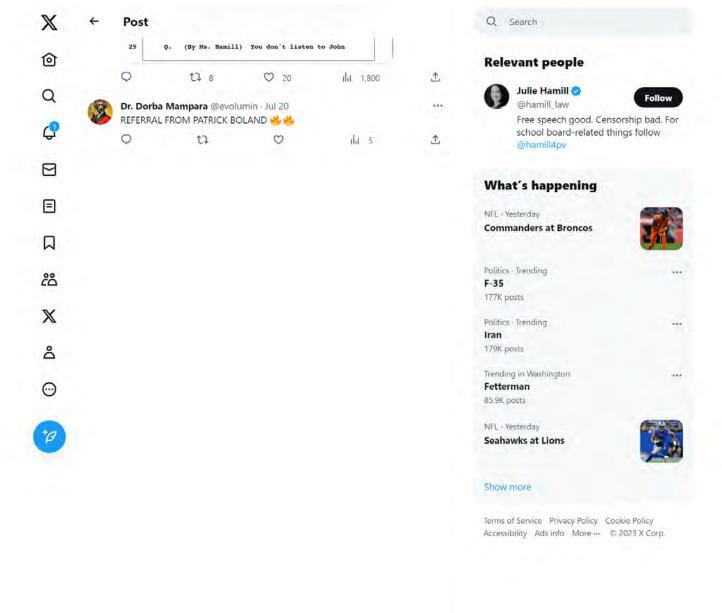


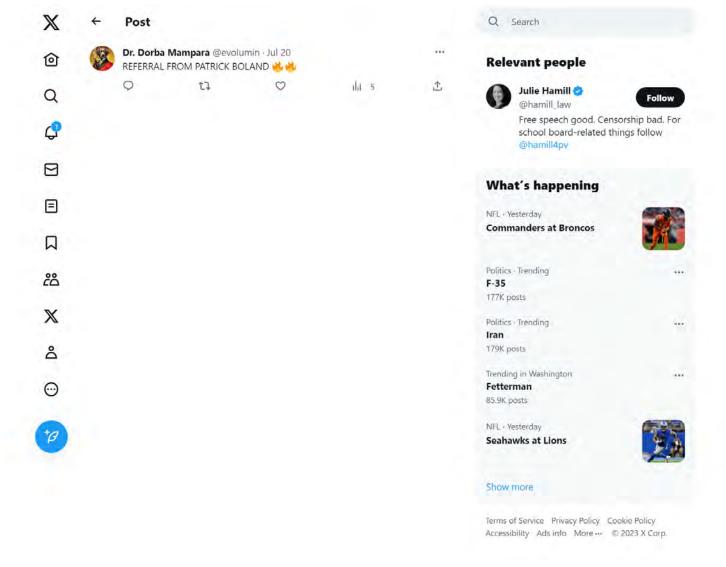


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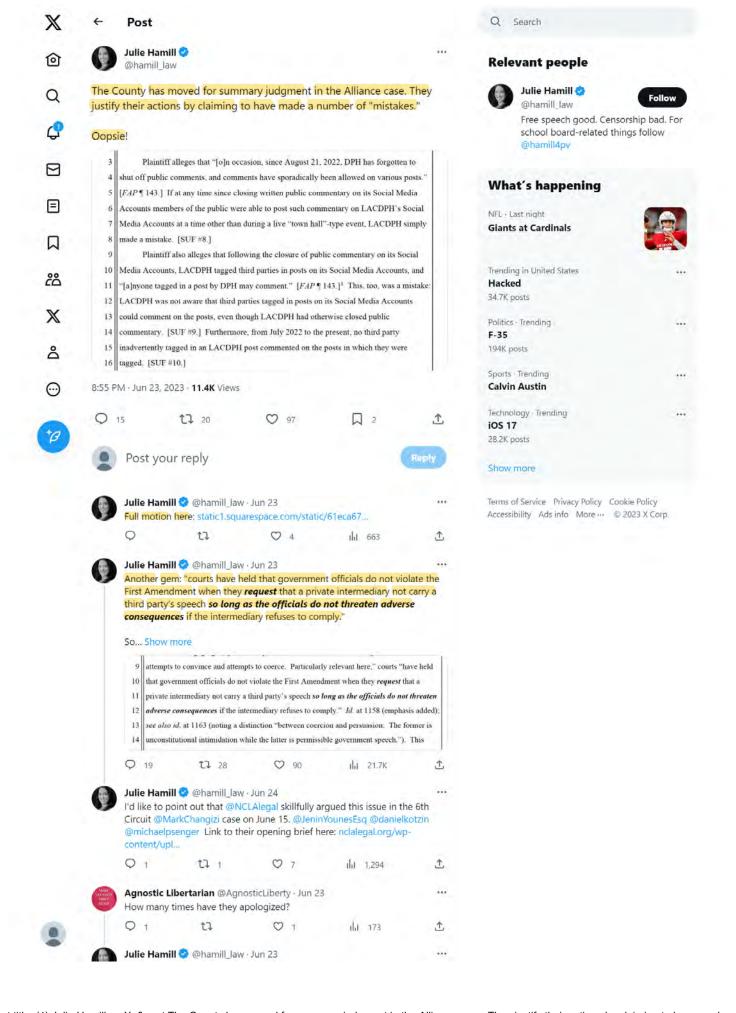


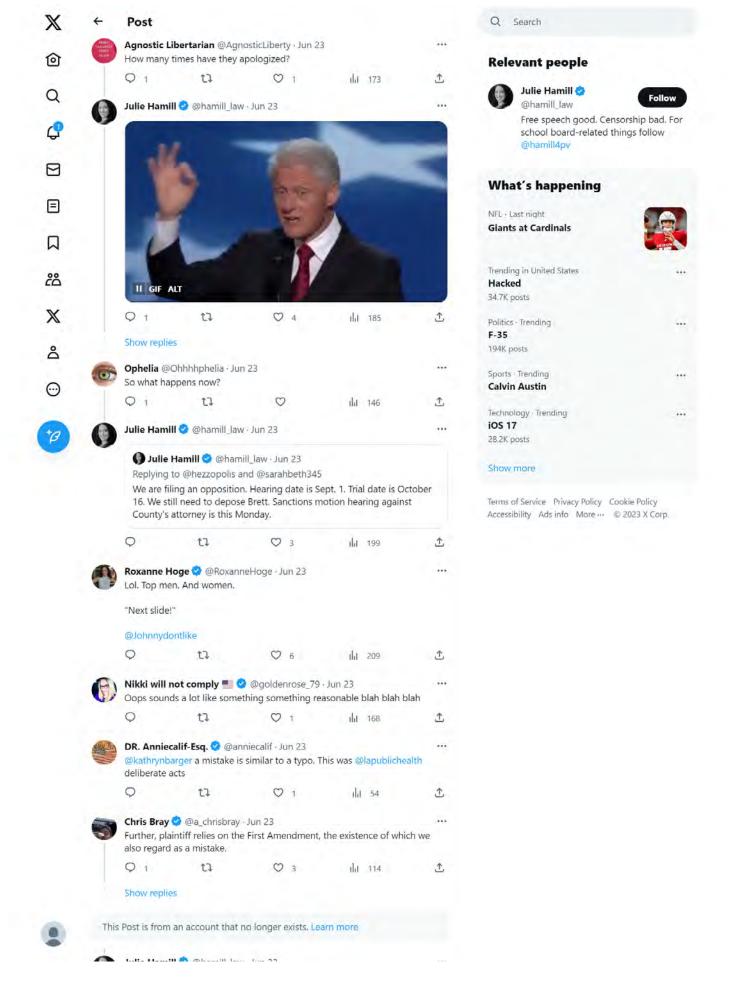


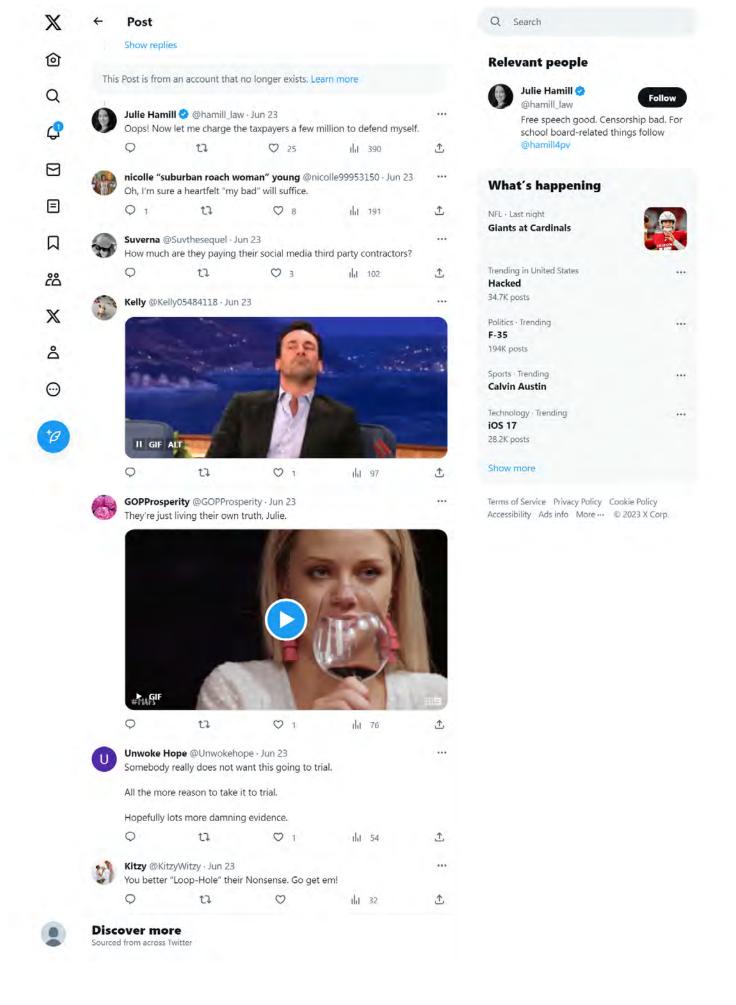


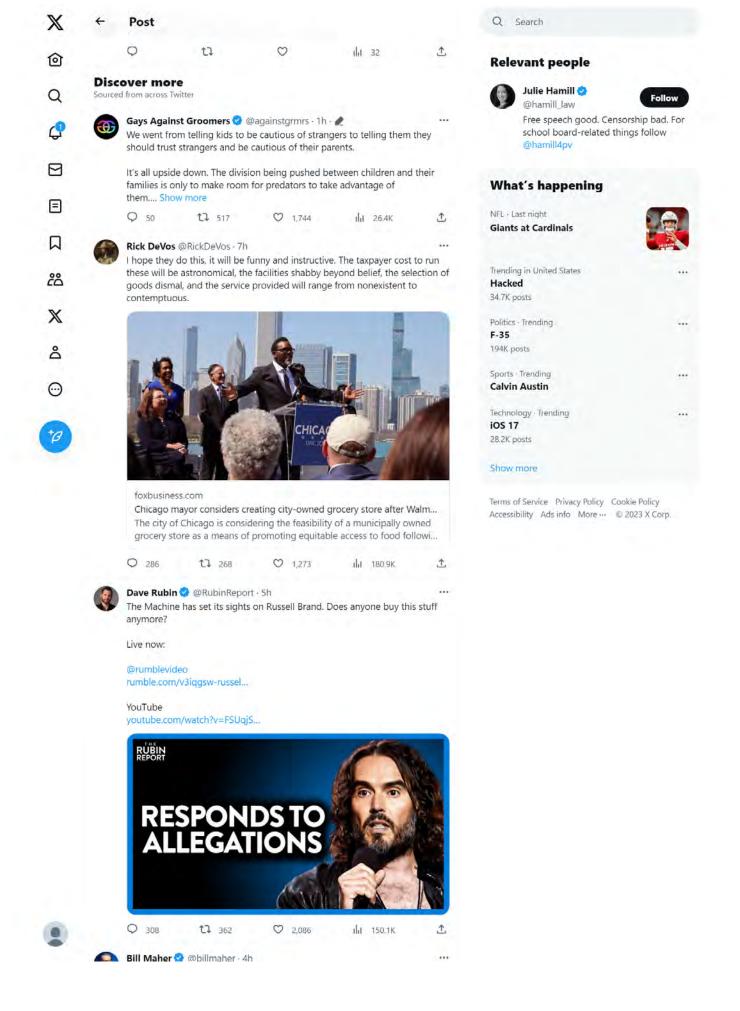


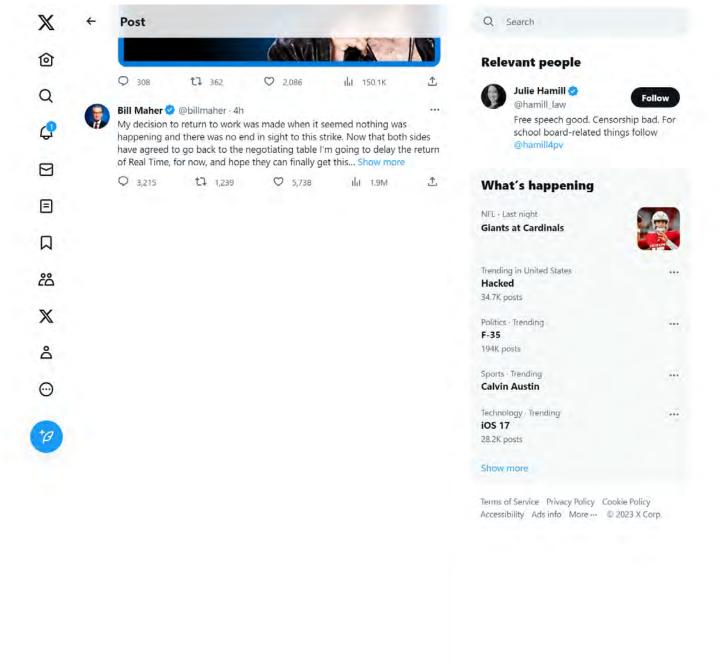
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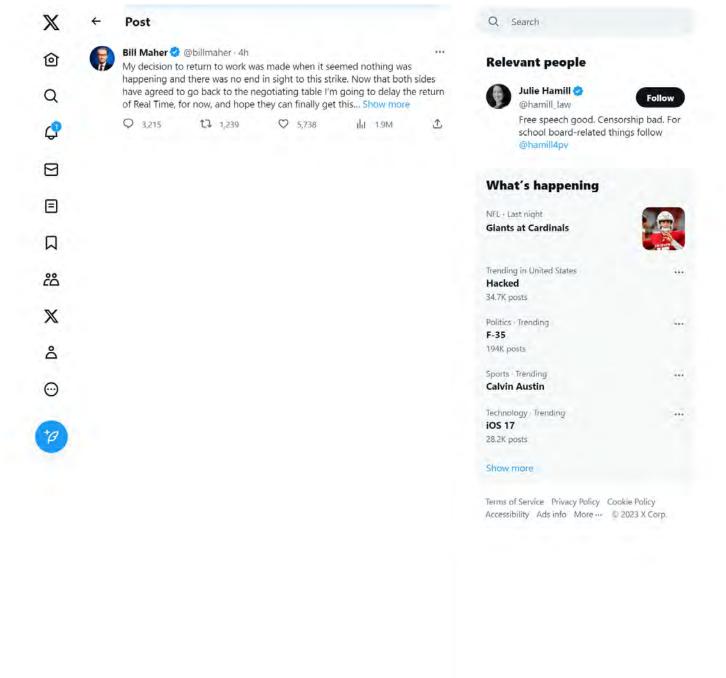






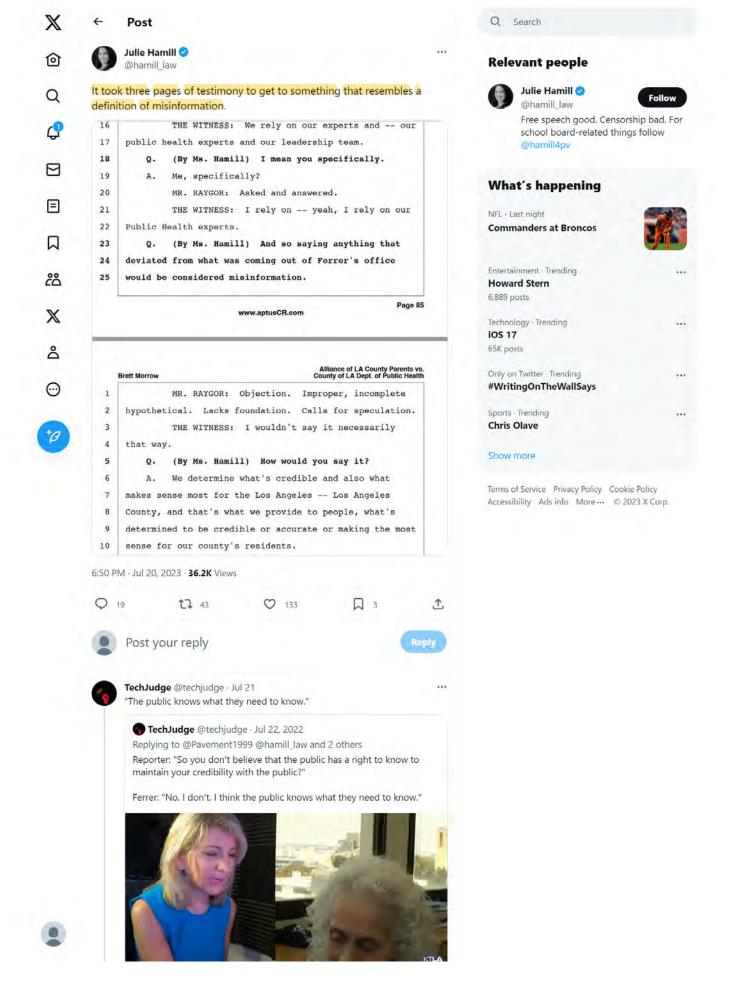


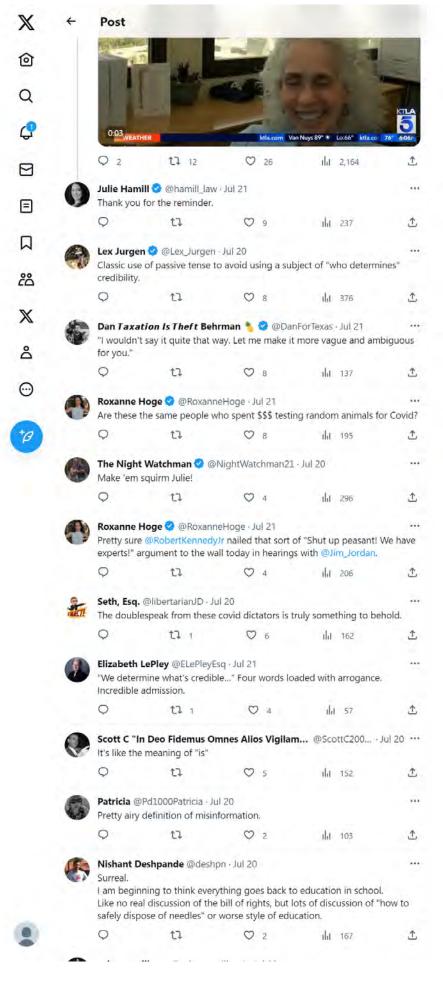


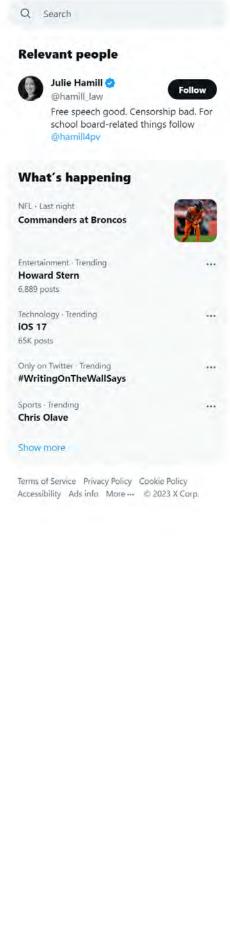


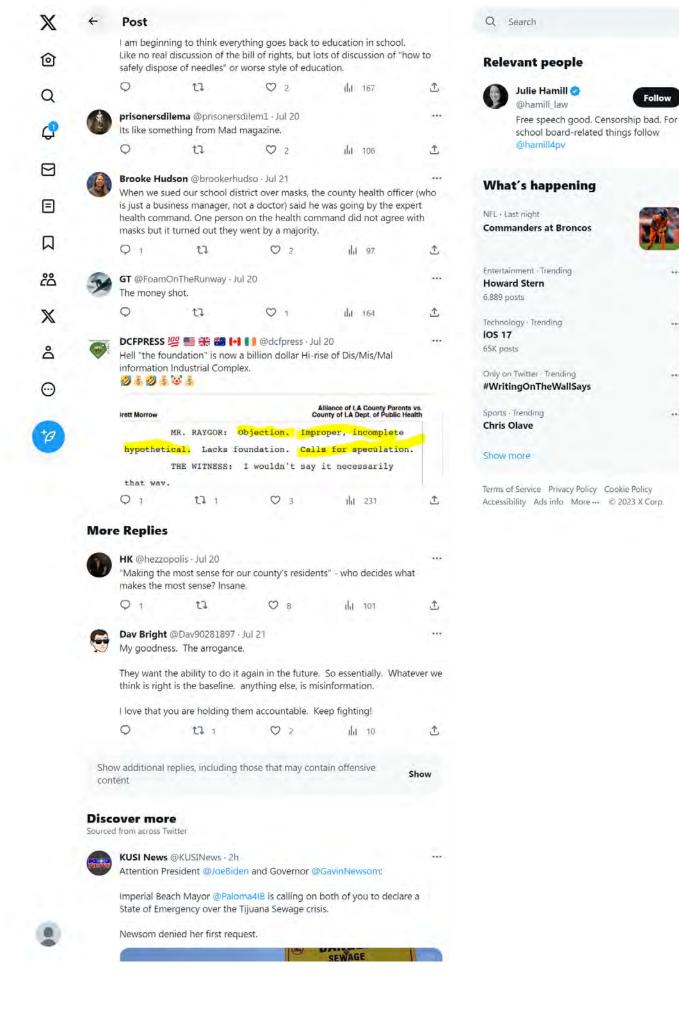


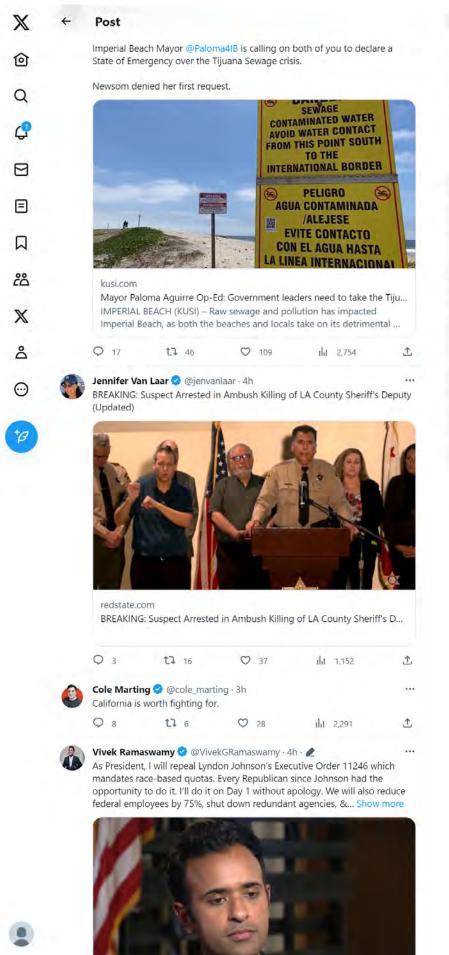
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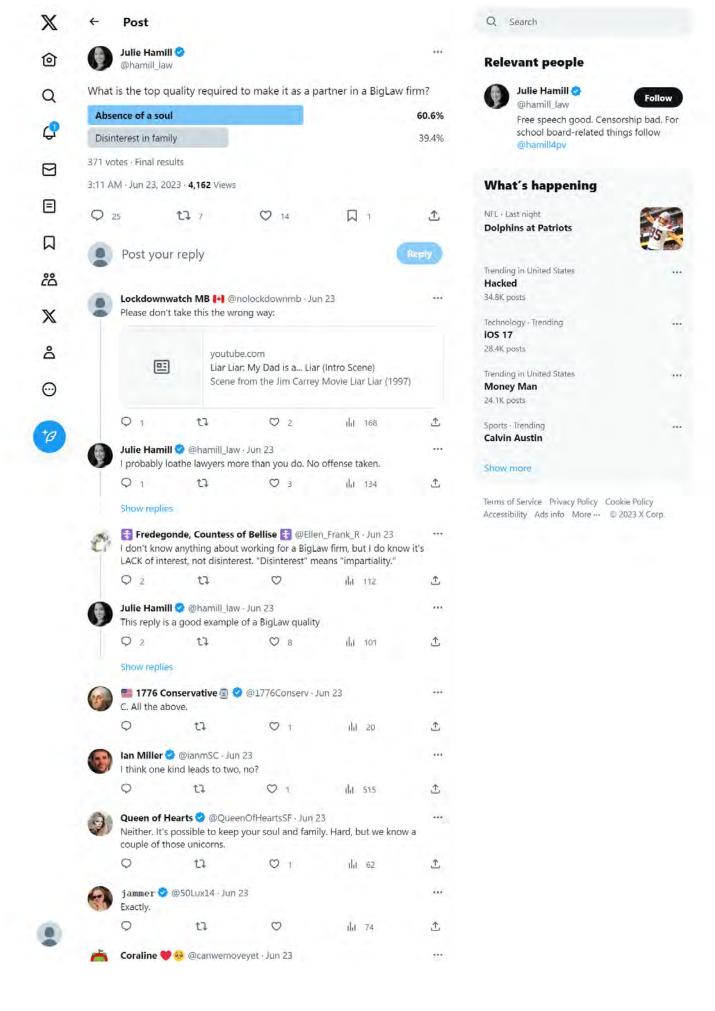


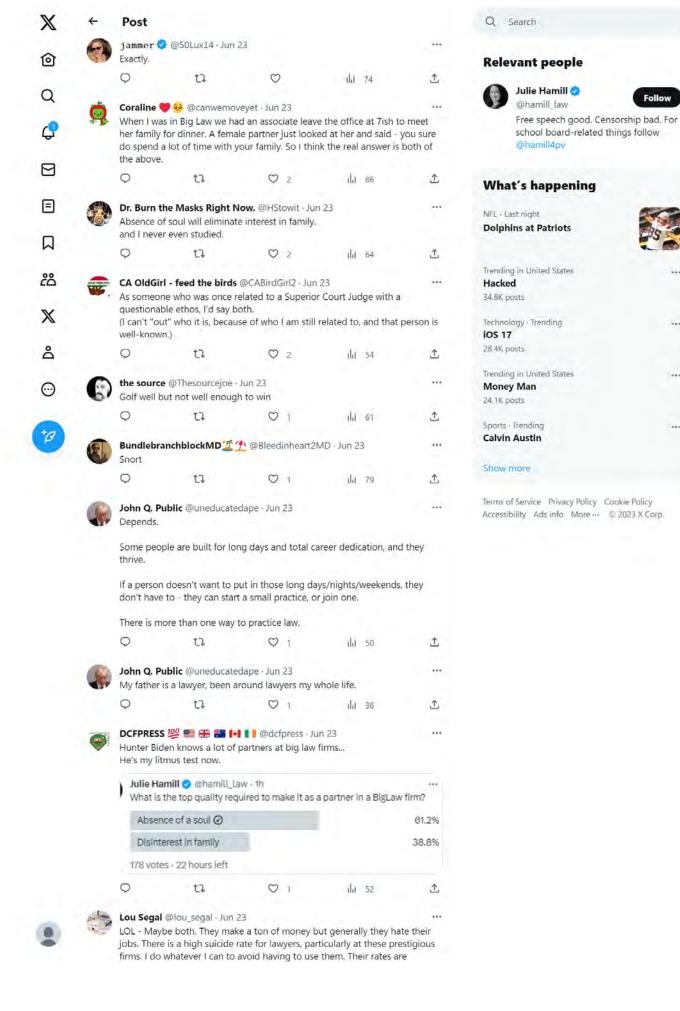




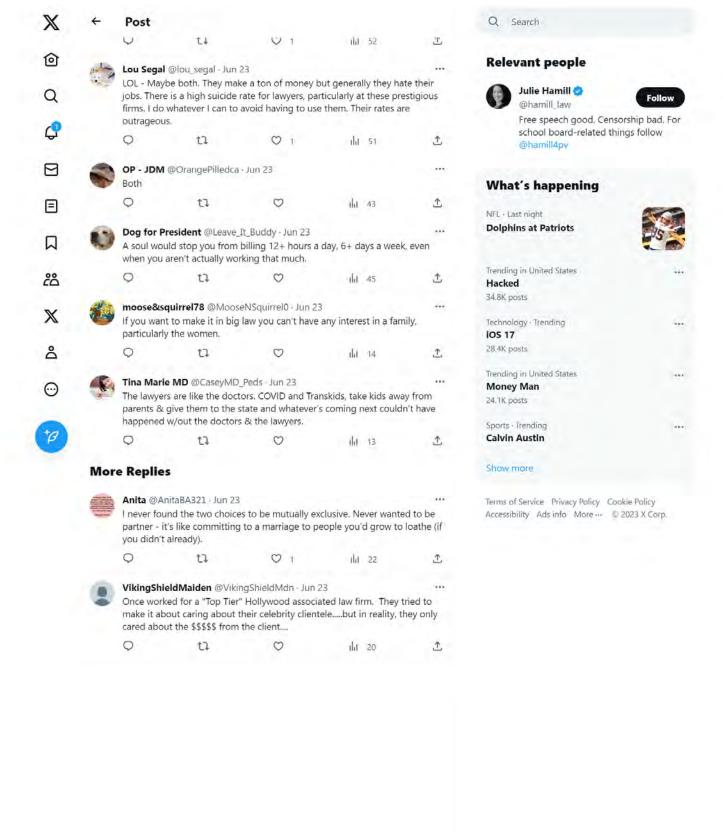


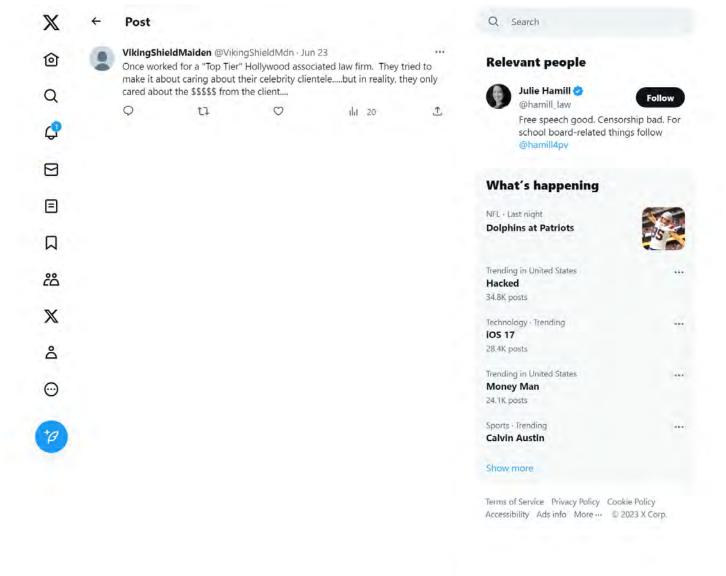
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Where the Parties wish to have a confidentiality stipulation and protective order the parties in all civil cases, other than products liability cases, are encouraged to use this Stipulated Confidentiality Order Form as an initial working draft to save time.

Where this Stipulated Confidentiality Order Form is used, then any proposed stipulated confidentiality order submitted to the Court MUST be accompanied by a "redlined' or "compare" version of this Form, so that the Court may readily see ALL MODIFICATIONS that were made to this Form. This procedure is intended to save you and the Court time, and promote faster processing of these proposed orders.

This model form confidentiality stipulation and protective order (the "Stipulated Confidentiality Order Form") does not address, and may not be used in, products liability cases.

SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES

ALLIANCE OF LOS	ANGELES COUN	ГΥ
PARENTS an uninco	rporated association	1

Petitioner and Plaintiff,

V.

COUNTY OF LOS ANGELES COUNTY
DEPARTMENT OF PUBLIC HEALTH;
MUNTU DAVIS, in his official capacity as
Health Officer for the County of Los Angeles;
BARBARA FERRER, in her official capacity
as Director of the County of Los Angeles
Department of Public Health; and DOES 1
through 25, inclusive,

Respondents and Defendants.

Plaintiffs,

VS.

Defendants.

Case No. 22STCP02772

LOS ANGELES MODEL

STIPULATION AND PROTECTIVE ORDER — CONFIDENTIAL

DESIGNATION ONLY

IT IS HEREBY STIPULATED by and between the Parties to Alliance of Los Angeles County Parents v. County of Los Angeles County Department of Public Health, et al., as well as Non-Party X Corp., Plaintiffs vs. Defendants, (list names of Plaintiffs and Defendants) by and through their respective counsel of record, that in order to facilitate the exchange of information and documents which may be subject to confidentiality limitations on disclosure due to federal laws, state laws, and privacy rights, the Parties stipulate as follows:

- In this Stipulation and Protective Order, the words set forth below shall have the following meanings:
 - a. "Proceeding" means the above-entitled proceeding (22STCP02772).
- b. "Court" means the Hon. (*list name of judge*) William F. Fahey, or any other judge to which this Proceeding may be assigned, including Court staff participating in such proceedings.
- c. "Confidential" means any information which is in the possession of a Designating Party who believes in good faith that such information is entitled to confidential treatment under applicable law.
- d. "Confidential Materials" means any Documents, Testimony or Information as defined below designated as "Confidential" pursuant to the provisions of this Stipulation and Protective Order.
- e. "Designating Party" means the Party or non-Party (including, but not limited to, X Corp.) that designates Materials as "Confidential."
- f. "Disclose" or "Disclosed" or "Disclosure" means to reveal, divulge, give, or make available Materials, or any part thereof, or any information contained therein.
- g. "Documents" means (i) any "Writing," "Original," and "Duplicate" as those terms are defined by California Evidence Code Sections 250, 255, and 260, which have been

produced in discovery in this Proceeding by any person, and (ii) any copies, reproductions, or summaries of all or any part of the foregoing.

- h. "Information" means the content of Documents or Testimony.
- "Testimony" means all depositions, declarations or other testimony taken or used in this Proceeding.
- 2. The Designating Party shall have the right to designate as "Confidential" any Documents, Testimony or Information that the Designating Party in good faith believes to contain non-public information that is entitled to confidential treatment under applicable law.
- 3. The entry of this Stipulation and Protective Order does not alter, waive, modify, or abridge any right, privilege or protection otherwise available to any Party with respect to the discovery of matters, including but not limited to any Party's right to assert the attorney-client privilege, the attorney work product doctrine, or other privileges, or any Party's right to contest any such assertion.
- 4. Any Documents, Testimony or Information to be designated as "Confidential" must be clearly so designated before the Document, Testimony or Information is Disclosed or produced. The parties may agree that the case name and number are to be part of the "Confidential" designation. The "Confidential" designation should not obscure or interfere with the legibility of the designated Information.
- a. For Documents (apart from transcripts of depositions or other pretrial or trial proceedings), the Designating Party must affix the legend "Confidential" on each page of any Document containing such designated Confidential Material.
 - b. For Testimony given in depositions the Designating Party may either:
 - i. identify on the record, before the close of the deposition, all "Confidential" Testimony, by specifying all portions of the Testimony that qualify as "Confidential;" or

- ii. designate the entirety of the Testimony at the deposition as "Confidential" (before the deposition is concluded) with the right to identify more specific portions of the Testimony as to which protection is sought within 30 days following receipt of the deposition transcript. In circumstances where portions of the deposition Testimony are designated for protection, the transcript pages containing "Confidential" Information may be separately bound by the court reporter, who must affix to the top of each page the legend "Confidential," as instructed by the Designating Party.
- c. For Information produced in some form other than Documents, and for any other tangible items, including, without limitation, compact discs or DVDs, the Designating Party must affix in a prominent place on the exterior of the container or containers in which the Information or item is stored the legend "Confidential." If only portions of the Information or item warrant protection, the Designating Party, to the extent practicable, shall identify the "Confidential" portions.
- 5. The inadvertent production by any of the undersigned-Parties or non-Parties to the Proceedings of any Document, Testimony or Information during discovery in this Proceeding without a "Confidential" designation, shall be without prejudice to any claim that such item is "Confidential" and such Party shall not be held to have waived any rights by such inadvertent production. In the event that any Document, Testimony or Information that is subject to a "Confidential" designation is inadvertently produced without such designation, the Party that inadvertently produced the document shall give written notice of such inadvertent production within twenty (20) days of discovery of the inadvertent production, together with a further copy of the subject Document, Testimony or Information designated as "Confidential" (the "Inadvertent Production Notice"). Upon receipt of such Inadvertent Production Notice, the Party that received the inadvertently produced Document, Testimony or Information shall promptly destroy the inadvertently produced Document, Testimony or Information and all copies thereof, or, at the

expense of the producing Party, return such together with all copies of such Document, Testimony or Information to counsel for the producing Party and shall retain only the "Confidential" designated Materials. Should the receiving Party choose to destroy such inadvertently produced Document, Testimony or Information, the receiving Party shall notify the producing Party in writing of such destruction within ten (10) days of receipt of written notice of the inadvertent production. This provision is not intended to apply to any inadvertent production of any Information protected by attorney-client or work product privileges. In the event that this provision conflicts with any applicable law regarding waiver of confidentiality through the inadvertent production of Documents, Testimony or Information, such law shall govern.

6. In the event that counsel for a Party receiving Documents, Testimony or Information in discovery designated as "Confidential" objects to such designation with respect to any or all of such items, said counsel shall advise counsel for the Designating Party, in writing, of such objections, the specific Documents, Testimony or Information to which each objection pertains, and the specific reasons and support for such objections (the "Designation Objections"). Counsel for the Designating Party shall have thirty (30) days from receipt of the written Designation Objections to either (a) agree in writing to de-designate Documents, Testimony or Information pursuant to any or all of the Designation Objections and/or (b) file a motion with the Court seeking to uphold any or all designations on Documents, Testimony or Information addressed by the Designation Objections (the "Designation Motion"). Pending a resolution of the Designation Motion by the Court, any and all existing designations on the Documents, Testimony or Information at issue in such Motion shall remain in place. The Designating Party shall have the burden on any Designation Motion of establishing the applicability of its "Confidential" designation. In the event that the Designation Objections are neither timely agreed to nor timely addressed in the Designation Motion, then such Documents, Testimony or Information shall be de-designated in accordance with the Designation Objection applicable to such material.

- 7. Access to and/or Disclosure of Confidential Materials designated as "Confidential" shall be permitted only to the following persons:
 - a. the Court;
- b. (1) Attorneys of record in the Proceedings and their affiliated attorneys, paralegals, clerical and secretarial staff employed by such attorneys who are actively involved in the Proceedings and are not employees of any Party. (2) In-house counsel to the undersigned Parties and the paralegal, clerical and secretarial staff employed by such counsel. Provided, however, that each non-lawyer given access to Confidential Materials shall be advised that such Materials are being Disclosed pursuant to, and are subject to, the terms of this Stipulation and Protective Order and that they may not be Disclosed other than pursuant to its terms;
- c. those officers, directors, partners, members, employees and agents of all non designating Parties that counsel for such Parties deems necessary to aid counsel in the prosecution and defense of this Proceeding; provided, however, that prior to the Disclosure of Confidential Materials to any such officer, director, partner, member, employee or agent, counsel for the Party making the Disclosure shall deliver a copy of this Stipulation and Protective Order to such person, shall explain that such person is bound to follow the terms of such Order, and shall secure the signature of such person on a statement in the form attached hereto as Exhibit A;

d.c. __court reporters in this Proceeding (whether at depositions, hearings, or any other proceeding);

e.d. any deposition, trial or hearing witness in the Proceeding who previously has had access to the Confidential Materials, or who is currently or was previously an officer, director, partner, member, employee or agent of an entity that has had access to the Confidential Materials:

f.e. any deposition or non-trial hearing witness in the Proceeding who previously did not have access to the Confidential Materials; provided, however, that each such witness given access to Confidential Materials shall be advised that such Materials are being

Disclosed pursuant to, and are subject to, the terms of this Stipulation and Protective Order and that they may not be Disclosed other than pursuant to its terms;

Gonfidential Materials to any such mock jury participant, counsel for the Party making the Disclosure shall deliver a copy of this Stipulation and Protective Order to such person, shall explain that such person is bound to follow the terms of such Order, and shall secure the signature of such person on a statement in the form attached hereto as Exhibit A.

h. outside experts or expert consultants consulted by the undersigned Parties or their counsel in connection with the Proceeding, whether or not retained to testify at any oral hearing; provided, however, that prior to the Disclosure of Confidential Materials to any such expert or expert consultant, counsel for the Party making the Disclosure shall deliver a copy of this Stipulation and Protective Order to such person, shall explain its terms to such person, and shall secure the signature of such person on a statement in the form attached hereto as Exhibit A. It shall be the obligation of counsel, upon learning of any breach or threatened breach of this Stipulation and Protective Order by any such expert or expert consultant, to promptly notify counsel for the Designating Party of such breach or threatened breach; and

i.f. any other person that the Designating Party agrees to in writing.

- 8. Confidential Materials shall be used by the persons receiving them only for the purposes of preparing for, conducting, participating in the conduct of, and/or prosecuting and/or defending the Proceeding, and not for any business or other purpose whatsoever.
- 9. Any Party to the Proceeding (or other person subject to the terms of this Stipulation and Protective Order) may ask the Court, after appropriate notice to the other Parties to the Proceeding, to modify or grant relief from any provision of this Stipulation and Protective Order.
- 10. Entering into, agreeing to, and/or complying with the terms of this Stipulation and Protective Order shall not:

- a. operate as an admission by any person that any particular Document,
 Testimony or Information marked "Confidential" contains or reflects trade secrets, proprietary,
 confidential or competitively sensitive business, commercial, financial or personal information; or
- b. prejudice in any way the right of any Party (or any other person subject to the terms of this Stipulation and Protective Order):
 - to seek a determination by the Court of whether any particular Confidential Material should be subject to protection as "Confidential" under the terms of this <u>Stipulation and Protective Order</u>; or
 - ii. to seek relief from the Court on appropriate notice to all other Parties to the Proceeding from any provision(s) of this Stipulation and Protective Order, either generally or as to any particular Document, Material or Information.
- 11. Any Party to the Proceeding who has not executed this Stipulation and Protective Order as of the time it is presented to the Court for signature may thereafter become a Party to this Stipulation and Protective Order by its counsel's signing and dating a copy thereof and filing the same with the Court, and serving copies of such signed and dated copy upon the other Parties to this Stipulation and Protective Order.
- 12. Any Information that may be produced by a non-Party witness in discovery in the Proceeding pursuant to subpoena or otherwise may be designated by such non-Party as "Confidential" under the terms of this Stipulation and Protective Order, and any such designation by a non-Party shall have the same force and effect, and create the same duties and obligations, as if made by one of the undersigned Parties heretoin the Proceeding. Any such designation shall also function as a consent by such producing Party to the authority of the Court in the Proceeding to resolve and conclusively determine any motion or other application made by any person or Party with respect to such designation, or any other matter otherwise arising under this Stipulation and Protective Order.

- 13. If any person subject to this Stipulation and Protective Order who has custody of any Confidential Materials receives a subpoena or other process ("Subpoena") from any government or other person or entity demanding production of Confidential Materials, the recipient of the Subpoena shall promptly give notice of the same by electronic mail transmission, followed by either express mail or overnight delivery to counsel of record for the Designating Party, and shall furnish such counsel with a copy of the Subpoena. Upon receipt of this notice, the Designating Party may, in its sole discretion and at its own cost, move to quash or limit the Subpoena, otherwise oppose production of the Confidential Materials, and/or seek to obtain confidential treatment of such Confidential Materials from the subpoenaing person or entity to the fullest extent available under law. The recipient of the Subpoena may not produce any Documents, Testimony or Information pursuant to the Subpoena prior to the date specified for production on the Subpoena.
- 14. Nothing in this Stipulation and Protective Order shall be construed to preclude either Party from asserting in good faith that certain Confidential Materials require additional protection. The Parties shall meet and confer to agree upon the terms of such additional protection.
- 15. If, after execution of this Stipulation and Protective Order, any Confidential Materials submitted by a Designating Party under the terms of this Stipulation and Protective Order is Disclosed by a non-Designating Party to any person other than in the manner authorized by this Stipulation and Protective Order, the non-Designating Party responsible for the Disclosure shall bring all pertinent facts relating to the Disclosure of such Confidential Materials to the immediate attention of the Designating Party.
- 16. This Stipulation and Protective Order is entered into without prejudice to the right of any Party to knowingly waive the applicability of this Stipulation and Protective Order to any Confidential Materials designated by that Party. If the Designating Party uses Confidential Materials in a non-Confidential manner, then the Designating Party shall advise that the designation no longer applies.

- Materials, is included in any motion or other proceeding governed by California Rules of Court, Rules 2.550 and 2.551, the party shall follow those rules. With respect to discovery motions or other proceedings not governed by California Rules of Court, Rules 2.550 and 2.551, the following shall apply: If Confidential Materials or Information derived from Confidential Materials are submitted to or otherwise disclosed to the Court in connection with discovery motions and proceedings, the same shall be separately filed under seal with the clerk of the Court in an envelope marked: "CONFIDENTIAL FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER AND WITHOUT ANY FURTHER SEALING ORDER REQUIRED."
- 18. The Parties, and relevant Nnon-Parties to the extent the Parties seek to use materials such Nnon-Parties have designated as "Confidential," shall meet and confer regarding the procedures for use of Confidential Materials at trial and shall move the Court for entry of an appropriate order.
- 19. Nothing in this Stipulation and Protective Order shall affect the admissibility into evidence of Confidential Materials, or abridge the rights of any person to seek judicial review or to pursue other appropriate judicial action with respect to any ruling made by the Court concerning the issue of the status of Protected Material.
- 20. This Stipulation and Protective Order shall continue to be binding after the conclusion of this Proceeding and all subsequent proceedings arising from this Proceeding, except that a Party may seek the written permission of the Designating Party or may move the Court for relief from the provisions of this Stipulation and Protective Order. To the extent permitted by law, the Court shall retain jurisdiction to enforce, modify, or reconsider this Stipulation and Protective Order, even after the Proceeding is terminated.
- 21. Upon written request made within thirty (30) days after the settlement or other termination of the Proceeding, the <u>undersigned</u> Parties shall have thirty (30) days to either (a) promptly return to counsel for each Designating Party all Confidential Materials and all copies

thereof (except that counsel for each Party may maintain in its files, in continuing compliance with the terms of this Stipulation and Protective Order, all work product, and one copy of each pleading filed with the Court [and one copy of each deposition together with the exhibits marked at the deposition)]*, (b) agree with counsel for the Designating Party upon appropriate methods and certification of destruction or other disposition of such Confidential Materials, or (c) as to any Documents, Testimony or other Information not addressed by sub-paragraphs (a) and (b), file a motion seeking a Court order regarding proper preservation of such Materials. To the extent permitted by law the Court shall retain continuing jurisdiction to review and rule upon the motion referred to in sub-paragraph (c) herein. *[The bracketed portion of this provision shall be subject to agreement between counsel for the Parties in each case.]

- 22. After this Stipulation and Protective Order has been signed by counsel for all Parties, it shall be presented to the Court for entry. Counsel agree to be bound by the terms set forth herein with regard to any Confidential Materials that have been produced before the Court signs this Stipulation and Protective Order.
- hereto as Exhibit A agree to be bound by this Stipulation and Protective Order pending its approval and entry by the Court. In the event that the Court modifies this Stipulation and Protective Order, or in the event that the Court enters a different Protective Order, the Parties and non-Parties (including, but not limited to, X Corp.) agree to be bound by this Stipulation and Protective Order until such time as the Court may enter such a different Order. It is the Parties' intent to be bound by the terms of this Stipulation and Protective Order pending its entry so as to allow for immediate production of Confidential Materials under the terms herein.

This Stipulation and Protective Order may be executed in counterparts.

Dated:

Attorneys for Plaintiffs	
	Attorneys for Plaintiffs

Dated:

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	Au C D C 1
	Attorneys for Defendants
	Attorneys for Derendants

ORDER

	GOOD CAUSE APPEARING	, the Court hereby	approves this Stipula	ation and Protective
Order	Ŧ			
	IT IS SO ORDERED.			
Dated	:			
		TI	HE HONORABLE	

EXHIBIT A

Certification Re Confidential Discovery Materials

I hereby acknowledge that I, [NAME],	
[POSITION AND EMPLOYER], am about to receive Confidential Materials	
supplied in connection with the Proceeding, (22STCP02772INSERT CASE NO.). I certify that	at
I understand that the Confidential Materials are provided to me subject to the terms and	
restrictions of the Stipulation and Protective Order filed in this Proceeding. I have been given a	
copy of the Stipulation and Protective Order; I have read it, and I agree to be bound by its terms	3.
I understand that Confidential Materials, as defined in the Stipulation and Protective Order,	
including any notes or other records that may be made regarding any such materials, shall not be	e
Disclosed to anyone except as expressly permitted by the Stipulation and Protective Order. I wi	Н
not copy or use, except solely for the purposes of this Proceeding, any Confidential Materials	
obtained pursuant to this Protective Order, except as provided therein or otherwise ordered by	
the Court in the Proceeding.	
I further understand that I am to retain all copies of all Confidential Materials provided to me in	ì
the Proceeding in a secure manner, and that all copies of such Materials are to remain in my	
personal custody until termination of my participation in this Proceeding, whereupon the copies	3
of such Materials will be returned to counsel who provided me with such Materials.	
I declare under penalty of perjury, under the laws of the State of California, that the foregoing i	S
true and correct. Executed this day of 20, at	
DATED: BY:	
Signature	
Title	

Address

City, State, Zip

Telephone Number

PROOF OF SERVICE 2 Alliance of Los Angeles County Parents v. County of Los Angeles, et al. **Case No. 22STCP02772** 3 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES 4 At the time of service, I was over 18 years of age and **not a party to this action**. I 5 am employed in the County of Los Angeles, State of California. My business address is 1901 Avenue of the Stars, Suite 1600, Los Angeles, CA 90067-6055. 6 On September 20, 2023, I served true copies of the following document(s) described 7 as DECLARATION OF KENT R. RAYGOR IN SUPPORT OF EX PARTE APPLICATION FOR A PROTECTIVE ORDER on the interested parties in this action as follows: 8 9 SEE ATTACHED SERVICE LIST 10 BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address lchu@sheppardmullin.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was 12 unsuccessful. 13 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. 14 Executed on September 20, 2023, at Los Angeles, California. 15 16 17 Lily Young Chu 18 19 20 21 22 23 24 25 26 27 28

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SMRH:4869-9344-0383

SERVICE LIST Attorneys for Petitioner/Plaintiff ALLIANCE OF LOS ANGELES Julie A. Hamill Hamill Law & Consulting 904 Silver Spur Road, #287 Rolling Hills Estates, California, 90274 Telephone: (424) 265-0529 Email: iulie@iuliehamill-law.com **COUNTY PARENTS**

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SMRH:4869-9344-0383