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12 Attorneys for Defendant  
SUPERIOR COURT OF CALIFORNIA,  
13 COUNTY OF SHASTA (erroneously sued herein as  
SHASTA COUNTY MARSHAL'S OFFICE)  
14

15 UNITED STATES DISTRICT COURT  
16 EASTERN DISTRICT OF CALIFORNIA

17 JAIME SCHMIDT, DEBRA KNOWLES,  
18 ELIZABETH SAMPSON, AND RYAN  
HENRIOULLE,

19 Plaintiffs,  
20

21 v.

22 SHASTA COUNTY MARSHAL'S OFFICE  
AND JOEL DEAN,

23 Defendants.  
24

Case No. 2:14-CV-02471-MCE-CMK

**STIPULATION AND PROTECTIVE ORDER  
REGARDING PRIVILEGED AND  
CONFIDENTIAL INFORMATION**

Date: January 10, 2019  
Time: 2:00 p.m.  
Courtroom: 7  
Judge: Hon. Morrison C. England, Jr.

Complaint Filed: October 21, 2014  
Trial Date: February 25, 2019

SLOAN SAKAI LLP YEUNG & WONG LLP  
Attorneys at Law

1 Pursuant to Local Rule 140(b), Defendant Superior Court of California, County of Shasta  
2 (“Defendant” or “Superior Court”) and Plaintiff Jaime Schmidt (“Plaintiff” or “Schmidt”) (collectively,  
3 the “Parties”) hereby stipulate and agree as follows:

4 1. A trial on Plaintiff’s ninth and tenth causes of action against Defendant for retaliation  
5 under Title VII of the Civil Rights Act of 1964, as amended (“Title VII”) and California’s Fair  
6 Employment and Housing Act (“FEHA”) is scheduled to commence on February 25, 2019.

7 2. Depending on the scope of the allegations presented at trial (as will be determined by the  
8 Court’s rulings on the parties’ concurrently-filed motions *in limine*), the Parties may need to present  
9 evidence (including exhibits) containing confidential personnel information with regard to non-party  
10 employees subject to state and federal rights to privacy (hereinafter, “Confidential Personnel  
11 Information”).

12 3. Such Confidential Personnel Information may include records taken from the personnel  
13 files of non-party employees who have not waived or otherwise elected to forego any claimed right of  
14 privacy to said information as well as documents reflecting or relating to internal complaints lodged by  
15 or against non-party employees as well as Defendant’s investigation into said complaints.

16 4. Accordingly, the Parties agree and request permission to redact from exhibits offered at  
17 trial qualifying as or containing such Confidential Personnel Information any identifying information  
18 with regard to non-party employees, including the employee’s name, date of birth, employee number or  
19 other similar identifying information. In the event the Court so orders, the Parties will also lodge  
20 unredacted copies of said exhibits under seal.

21 5. There is good cause and particularized need for the protective order proposed herein. The  
22 privacy rights of non-party employees would likely be harmed if documents (including documents from  
23 their personnel files) were left without any protection and presented to the jury for consideration.  
24 Consequently, courts regularly and frequently limit the disclosure of such highly confidential and  
25 sensitive personnel information. *See, e.g., Knoll v. American Tel. & Tel. Co.*, 176 F.3d 359, 365 (6th Cir.  
26 1999) (affirming district court’s decision to limit access of defendant’s employees because “personnel  
27 files might contain highly personal information such as an individual’s unlisted address and telephone  
28 number, marital status, wage information, medical background, credit history (such as requests for

garnishment of wages), and other work-related problems unrelated to plaintiff’s claims”); *Grinzi v. Barnes*, 2004 WL 2370639, at \*3 (N.D. Cal. Oct. 20, 2004) (“The proper mechanism for an employer to use to protect an employee’s privacy interests in his personnel file is to obtain, either by stipulation or motion, a properly crafted protective order”).

**IT IS SO STIPULATED.**

Respectfully submitted,

Dated: December 13, 2018

CLAYEO C. ARNOLD, A PROFESSIONAL LAW CORPORATION

By: \_\_\_\_\_ /s/  
Anthony J. Poidmore  
Attorney for Plaintiff Jaime Schmidt

Dated: December 13, 2018

SLOAN SAKAI YEUNG & WONG LLP

By: \_\_\_\_\_ /s/  
Steve Cikes  
Attorney for Defendant Superior Court of California,  
County of Shasta

**PROTECTIVE ORDER**

Per the Parties’ stipulation, and good cause appearing therefor, it is hereby ordered that the Parties are permitted to redact from exhibits offered at trial qualifying as or containing Confidential Personnel Information any identifying information with regard to non-party employees, including the employee’s name, date of birth, employee number or other similar identifying information. In the event the Court so orders, the Parties will also lodge unredacted copies of said exhibits under seal.

**IT IS SO ORDERED.**

Dated: December 30, 2018

  
MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE

SLOAN SAKAI LLP YEUNG & WONG LLP  
Attorneys at Law