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8 OPPORTUNITY COMMISSION

FILED
CLERK, U.S. DISTRICT COURT
AUG 28 2007
CENTRAL DISTRICT OF CALIFORNIA
BY *[Signature]* DEPUTY

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U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES, CALIF.
NL

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

U.S. EQUAL EMPLOYMENT
OPPOR EUNTY COMMISSION,

Plaintiff,

vs.

CATHOLIC HEALTHCARE WEST,
d/b/a NORTHRIDGE HOSPITAL
MEDICAL CENTER, AND DOES 1-
10, INCLUSIVE,

Defendants.

CASE NO. CV 06-1915-DDP (SSx)

STIPULATED PROTECTIVE
ORDER PURSUANT TO HEALTH
INSURANCE PORTABILITY AND
ACCOUNTABILITY ACT OF 1996
REGULATION 45 C.F.R. SECTION
164.512; [~~PROPOSED~~] ORDER

DOCKETED ON CM
AUG 28 2007
BY *[Signature]* 051

(21)

1 **STIPULATION**

2 IT IS HEREBY STIPULATED that to comply with the Health Insurance
3 Portability and Accountability Act of 1996 ("HIPPA"), that the parties stipulate as
4 follows regarding the disclosure by Dr. Rebecca Perlow of any medical information,
5 deposition testimony, and/or documents pertaining to Avril Betoushana and Diana
6 Girard-Simone.

7 **1. Use of Medical Information and/or Documents**

8 Regarding any medical information, deposition testimony, and/or documents
9 pertaining to Avril Betoushana and Diana Girard-Simone provided by Dr. Rebecca
10 Perlow, the parties agree not to use the information, the deposition testimony, and any
11 documents provided by Dr. Perlow for any purpose other than this litigation.

12 **2. Persons Authorized to Receive Information**

13 Regarding any medical information pertaining to Avril Betoushana and Diana
14 Girard-Simone provided by Dr. Rebecca Perlow, the parties agree that the information,
15 deposition testimony, and any documents provided by Dr. Perlow shall not be
16 disclosed to or discussed with any person except:

- 17 a. counsel to the parties, and their staffs (including legal assistants
18 and other persons employed and supervised by such counsel) as
19 reasonably necessary to assist such counsel in the conduct of this
20 litigation;
- 21 b. the parties and any officers, directors, employees, and agents of the
22 parties as reasonably necessary to assist counsel in the conduct of
23 this litigation;
- 24 c. witnesses, experts, consultants, and other persons from whom
25 counsel may seek to obtain evidence and advice to the extent
26 deemed reasonably necessary by counsel for the conduct of this
27 litigation;
- 28 d. any person who is deposed or testifies in this action, and counsel

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for such person to the extent deemed reasonably necessary by
counsel for the conduct of this litigation;

- e. the Court (including the jury);
- f. the court reporters and deposition transcript reporters; and
- g. other persons only upon consent of the designating party or person
or upon order of the Court.

**3. FILING OF INFORMATION, DEPOSITION TRANSCRIPT, AND
DOCUMENTS COVERED BY THIS STIPULATED PROTECTIVE
ORDER**

In the event the deposition transcript and/or documents are attached as an
exhibit to any brief, memorandum, or document which is filed with either the Court or
the Clerk during the course of proceedings arising out of this action, the party using
such material shall redact the name, address, telephone number, and social security
number of the individual(s) listed in the document. The last four digits of the social
security number may be used in the filing if an identifier is necessary.

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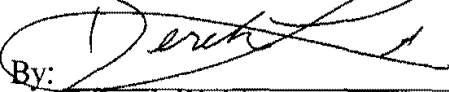
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4. RETURN OR DESTRUCTION OF DOCUMENTS AND OF THE DEPOSITION TRANSCRIPT UPON TERMINATION OF THIS ACTION.

At the final conclusion of this action (including any appeals) and unless the Court otherwise orders, any deposition transcripts and documents provided and any copies made shall be returned to Dr. Rebecca Perlow or such material shall be certified in writing to have been destroyed.

Dated: August 22, 2007

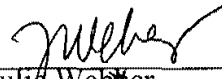
U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION



By: Derek W. Li
Attorneys for Plaintiff U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Dated: August 21, 2007

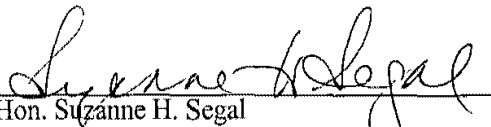
BALLARD, ROSENBERG GOLPER & SAVITT LLP

By: 
Julie Webber
Attorneys for Defendant
Catholic Healthcare West

[PROPOSED] ORDER

Based upon the foregoing Stipulation, **IT IS SO ORDERED.**

Dated: 8/28, 2007


Hon. Suzanne H. Segal
UNITED STATES MAGISTRATE JUDGE

PROOF OF SERVICE

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I am, and was at the time the herein mentioned mailing took place, a citizen of the United States, over the age of eighteen (18) years and not a party to the above-entitled cause.

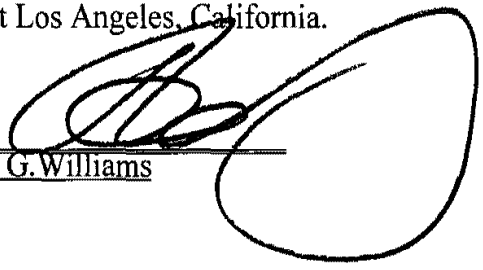
I am employed in the Litigation Unit of the Los Angeles District Office of the United States Equal Employment Opportunity Commission.

My business address is Equal Employment Opportunity Commission, Los Angeles District Office, 255 East Temple Street, Fourth Floor, Los Angeles, CA 90012.

On the date that this declaration was executed, as shown below, I served the foregoing **STIPULATED PROTECTIVE ORDER PURSUANT TO HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT OF 1996 REGULATION 45 C.F.R. SECTION 164.512; [PROPOSED] ORDER** by mail in a sealed envelope with postage therein fully prepaid, in regular mail at Los Angeles, County of Los Angeles, State of California, which were addressed as follows:

Linda Miller Savitt
George C. Williams
Ballard, Rosenberg, Golper & Savitt, LLP
10 Universal City, Plaza, Sixteenth Floor
Universal City, CA 91608-1097

I declare under penalty of perjury that the foregoing is true and correct.
Executed on August 22, 2007 at Los Angeles, California.



Lina G. Williams