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5 Attorneys for Real Party in Interest  
6 LOS ANGELES POLICE DEPARTMENT  
7 CUSTODIAN OF RECORDS

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF LOS ANGELES

11 PEOPLE OF THE STATE OF CALIFORNIA,  
12 Plaintiff,  
13 vs.  
14 DONALD JAMES MYERS  
15 aka: ANGRYGAY MONIKER,  
16 Defendant,  
17 \_\_\_\_\_  
18 LOS ANGELES POLICE DEPARTMENT  
19 CUSTODIAN OF RECORDS,  
20 Real Party In Interest.

CASE NO. 6CJ06496  
[PROPOSED] PROTECTIVE ORDER  
RE: DISCLOSURE OF CONFIDENTIAL  
INFORMATION  
(Evidence Code Section 1045(e))  
DATE: April 13, 2016  
TIME: 8:30 a.m.  
PLACE: Department 54

22 **IT IS HEREBY ORDERED:**

23 The following Protective Order, issued under Evidence Code Section 1045(e), shall  
24 govern the disclosure of documents and/or information, including "Compliance Sheets,"  
25 produced in accordance with the Court's *In Camera* review of the documents on \_\_\_\_\_,  
26 2016 (hereinafter, the "protected documents"):

- 27 1. Use of the protected documents and the information contained therein is limited to  
28 this criminal matter and, in particular, said protected documents and the product of the

1 same shall not be utilized by the Prosecuting Agency, the defendant or defendant's attorney of  
2 record or any other individual in the prosecution or defense of any other criminal or civil  
3 proceeding.

4 2. Under no circumstances shall the protected documents, or the information contained  
5 therein, be retained, compiled, stored, used as a data base, or disseminated, in any form, except  
6 for purposes of this criminal matter in accordance with this Protective Order or by further order  
7 of the court.

8 3. Use of the protected materials and the information contained therein is limited to  
9 authorized persons working for the Prosecution, the Defense and the court on this specific  
10 criminal matter.

11 4. Counsel to any party to this action shall advise those individuals to whom disclosure  
12 is made in accordance with this Protective Order of the contents of this Protective Order.

13 5. If the protected information is included in any court documents, those documents  
14 should be submitted under seal.

15 6. Provisions of this Order insofar as they restrict disclosure and the use of material  
16 shall be in effect until further order of the Court.

17  
18 **IT IS SO ORDERED.**

19  
20 DATED: \_\_\_\_\_, 2016

\_\_\_\_\_  
JUDGE OF THE SUPERIOR COURT

**PROOF OF SERVICE**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 201 N. Los Angeles Street, Space 301A, Los Angeles Mall, Los Angeles, CA 90012.

On April 4, 2016 I served the foregoing document described as:

**[PROPOSED] PROTECTIVE ORDER RE: DISCLOSURE OF  
CONFIDENTIAL INFORMATION (Evidence Code Section 1045(e))**

on the interested party(ies) in this action by placing the true copy(ies) thereof enclosed in sealed envelope(s) addressed as follows:

**GRAHAM E. BERRY, ESQ.  
3384 McLAUGHLIN AVENUE  
LOS ANGELES, CA 90066-2005**

**TELEPHONE: (310) 745-3771**

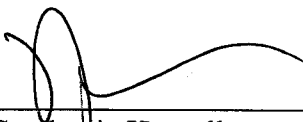
**BY ELECTRONIC MAIL** - I caused such documents to be transmitted to the offices of the addressee via e-mail at [LDeLaTorre@pubdef.lacounty.gov](mailto:LDeLaTorre@pubdef.lacounty.gov) prior to 5:00 p.m. on the date specified above.

**BY MAIL** - I caused each envelope with postage fully prepaid, to be placed in the United States Mail at Los Angeles, California. I thereafter caused such envelope to be deposited in the mail at Los Angeles, California, with first class postage thereon fully prepaid. I am readily familiar with the business practice for collection and processing of correspondence for mailing. Under that practice, it is deposited with the United States Postal Service on that same day, at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one (1) day after the date of deposit for mailing in affidavit.

**BY LA CITY ATTORNEY'S DOCUMENT SERVICES** - I caused each envelope to be sent via messenger, 200 N. Main St., 800 City Hall East, Los Angeles, CA 90012.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed April 4, 2016 at Los Angeles, California.

  
\_\_\_\_\_  
Stephanie Hansell