1 2 3 4 5	Alan E. Wisotsky – State Bar No. 68051 James N. Procter II – State Bar No. 96589 Jeffrey Held – State Bar No. 106991 WISOTSKY, PROCTER & SHYER 300 Esplanade Drive, Suite 1500 Oxnard, California 93036 Phone: (805) 278-0920 Facsimile: (805) 278-0289 Email: jheld@wps-law.net	
6	Attorneys for Defendant,	
7 8	VENTURA COUNTY SHERIFF'S OFFICE (erroneously sued as Ventura County Sheriffs Department)	
9	UNITED STATES DISTRICT COURT	
10	CENTRAL DISTRICT OF CALIFORNIA	
11		
12	SIGITAS RAULINAITIS,	CASE NO. CV13-02605-MAN
13	Plaintiff,	JOINT STIPULATION TO REMOVE
14	v.	EXHIBITS FROM CENTRAL DISTRICT WEBSITE AND TO
15	VENTURA COUNTY SHERIFFS DEPARTMENT,	ALLOW THEM TO BE FILED UNDER SEAL
16	Defendant.	
17		
18	IT IC HEDEDY CTIDIT ATEL	
19	IT IS HEREBY STIPULATED by and between the parties to this action,	
20	through their counsel of record, as follows:	
21	1. Exhibits "C" through "J" (three through 10) of Central District Website	
22	filing entry 16, on June 14, 2013, by defendant, Ventura County Sheriff's	
23	Department, should be removed from the Central District's public website as soon as	
24	possible. The parties would like these to be removed from the public website with	
25	urgency because these exhibits contain personal and sensitive information about the	
26	plaintiff which, while arguably relevant to the parties' dispute, has no business being	
27	publicly accessible.	
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- 2. Federal Rule of Civil Procedure 5.2 requires filing under seal or redaction of information in attachments and exhibits which contain private, sensitive data, as do the exhibits sought to be removed from the publicly accessible website by this stipulation.
- These exhibits sought to be removed from the public website, "C" 3. through "J", were inadvertently filed publicly when they should have been filed under seal to the attention of the assigned judge, Margaret A. Nagle.
- 4. Plaintiff's counsel, Jonathan Birdt, is inaccessible for signature but has fully authorized defendant's counsel to sign his name to this stipulation and to take any other action necessary to accomplish the removal of the objectionable exhibits from the Central District's website docket.
- 5. Defense counsel has therefore signed this stipulation for an order removing the eight exhibits from the Central District website and allowing them to be filed under seal with Mr. Birdt's full concurrence given on June 14, 2013, at 1:59 p.m.
- The proposed order granting this stipulated request is lodged 6. concurrently herewith.

By

DATED: June 14, 2013

WISOTSKY, PROCTER & SHYER

for Defendant,

A COUNTY SHERIFF'S OFFICE

DATED: June 14, 2013

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