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10 **UNITED STATES DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**
12 **SAN DIEGO DIVISION**

13 IN RE: BANK OF AMERICA
14 CALIFORNIA UNEMPLOYMENT
15 BENEFITS LITIGATION

Case No. 21md2992-LAB (MSB)

16 **ORDER REGARDING**
17 **PROTECTION OF**
18 **CONFIDENTIAL INFORMATION**
19 **[ECF No. 75]**

20 Defendant Bank of America (“BANA”) and the Individual Plaintiffs
21 represented by Interim Liaison Counsel for the Individual Plaintiffs (collectively
22 the “Parties”), have stipulated and agreed as follows:

23 1. The Individual Plaintiffs represented by Interim Liaison Counsel agree
24 to be bound by the terms of the Proposed Protective Order, pending its approval
25 and entry by the Court.

26 2. In the event that the Court modifies the Proposed Protective Order, or
27 in the event that the Court enters a different Protective Order, the Individual
28 Plaintiffs represented by Interim Liaison Counsel for the Individual Plaintiffs agree

Case No. 21md2992-LAB (MSB)

**ORDER RE: STIPULATION REGARDING PROTECTION OF CONFIDENTIAL
INFORMATION**

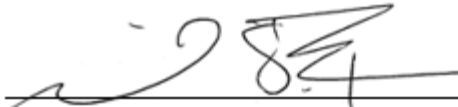
1 to be bound by the Proposed Protective Order until such time as the Court may
2 enter such different Order.

3 3. The intent of this agreement is to allow for the production of
4 documents with confidential information under the terms of the Proposed Protective
5 Order, pending its entry (or the entry of a different protective order).

6 4. Counsel for Individual Plaintiffs solemnly promise and represent that
7 they will not disclose or use in any manner any information or item produced by
8 BANA except in strict compliance with the provisions of the Proposed Protective
9 Order (or with any other protective order to be entered by the Court).

10 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

11 Dated: September 14, 2021

12 
13 Honorable Michael S. Berg
14 United States Magistrate Judge
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