

BARBARA J. PARKER, City Attorney, CABN 69722
RYAN RICHARDSON, Special Counsel, CABN 223548
BRIGID S. MARTIN, Special Counsel, CABN 231705
One Frank H. Ogawa Plaza, 6th Floor
Oakland, California 94612
Telephone: (510) 238-3751
Facsimile: (510) 238-6500
Email: BMartin@oaklandcityattorney.org

Attorneys for CITY OF OAKLAND

JOHN L. BURRIS, CABN 69888
Law Offices of John L. Burris
Airport Corporate Centre
7677 Oakport Street, Ste. 1120
Oakland, California 94621
Telephone: (510) 839-5200
Facsimile: (510) 839-3882

JAMES B. CHANIN, CABN 76043
Law Offices of James B. Chanin
3050 Shattuck Avenue
Berkeley, California 94705
Telephone: (510) 848-4752

Attorneys for PLAINTIFFS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DELPHINE ALLEN, et al.)	Case No. 00-cv-04599 WHO
)	
Plaintiffs,)	STIPULATED ADDENDUM TO
)	PROTECTIVE ORDER (DKT. 1190)
v.)	
)	
CITY OF OAKLAND, et al.,)	
)	
Defendant(s).)	
)	
)	

The parties agree that the Stipulated Protective Order Between the City and
Plaintiffs' Counsel James B. Chanin Regarding Confidential Police Personnel and

1 Law Enforcement Records Discussed in Departmental Risk Management Meetings
2 (Dkt. 1190), entered by the Court on February 20, 2018, shall include the following
3 addendum:

4 The stipulated protective order is hereby extended to cover all information
5 and documents disclosed to Mr. Chanin during or for the purposes of Mr. Chanin's
6 participation in meetings with the Oakland Police Department (Department) and
7 the Monitoring Team during which the Monitoring Team gives feedback to the
8 Department regarding use of force or internal affairs investigations related to
9 Negotiated Settlement Agreement Tasks 2, 5, and 25, and the Department responds
10 to the Monitoring Team's requests for additional information about particular
11 investigations. All information and documents disclosed to Mr. Chanin during or
12 for these purposes, whether or not physically stamped "CONFIDENTIAL," is hereby
13 deemed "Protected Material" as set forth in Definition 2.4. Dkt. 1190 at 2:3-4.

14 This addendum does not confer any rights on Mr. Chanin to attend use of
15 force and internal affairs investigation feedback meetings. Mr. Chanin's attendance
16 ///

1 may be permitted or denied at any such feedback meeting at the discretion of the
2 Monitoring Team or the Chief of Police.

3 IT IS SO STIPULATED.

4 Dated: September 17, 2021 BARBARA J. PARKER, City Attorney
5 BRIGID S. MARTIN, Special Counsel

6 By: /s/ Brigid S. Martin*
7 Attorneys for Defendants
8 CITY OF OAKLAND

9 Dated: September 17, 2021 JAMES B. CHANIN
10 Law Offices of James B. Chanin

11 By: /s/ James B. Chanin
12 Attorney for Plaintiffs

13 *Per Local Rule 5-1(i)(3), the filer attests that concurrence in the filing of the
14 document has been obtained from each of the other Signatories

15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

16 DATED: September 21, 2021

17 
18 HON. WILLIAM H. ORRICK
19 United States District Judge
20
21
22
23
24
25
26
27
28