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9 **ROBB EVANS & ASSOCIATES LLC**

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ORIGINAL FILED  
Superior Court Of California  
County Of Los Angeles

OCT 10 2018

Sherri R. Caris, Bookkeeper  
By: Darrin Oura Deputy

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **FOR THE COUNTY OF LOS ANGELES, SOUTH DISTRICT**

12 Randolph Anthony Garcia and Victorianna  
13 Hendrickson, Trustees of The Amended  
14 and Restated Garcia Family Trust UTD  
15 October 28, 2009, individually, and as  
16 Limited Partner of the CA Pedersen Client  
17 Investment Pool Limited Partnership, et al.,

18 Plaintiffs,

19 vs.

20 Carol A. Pedersen, C.P.A., Individually, et  
21 al,

22 Defendants.

Case No. NC061364

~~[PROPOSED]~~ **ORDER GRANTING EX  
PARTE APPLICATION FOR ORDER FOR  
THE PROTECTION OF DOCUMENTS**

DATE: October 10, 2018  
TIME: 8:30 a.m.  
DEPT: S26

**Complaint Filed: August 31, 2017**

23 The *Ex Parte* Application for Order for the Protection of Documents (“Application”) filed  
24 by Robb Evans & Associates LLC, Receiver (“Receiver”) came on for hearing on October 10,  
25 2018 at 8:30 a.m. in Courtroom S26 of the above-referenced Court, the Honorable Michael P.  
26 Vicencia, Superior Court Judge Presiding. Gary Owen Caris of Barnes & Thornburg LLP  
27 appeared on behalf of the Receiver and other appearances were made as noted in the record. The  
28 Court, having read and considered the Application together with all declarations and evidence  
filed in support of the Application, having determined that (a) Defendant Carol Pedersen

1 (“Pedersen”) turned over to the Federal Bureau of Investigation (“FBI”) substantial amounts of  
2 paper records and electronic documents in or about February 2018 (“Pedersen Records”); (b) the  
3 Receiver having made written request for the Pedersen Records by letter to the United States  
4 Attorney’s Office on or about April 2, 2018; (c) the United States Attorney’s Office having  
5 directed that the Receiver submit a subpoena for the Pedersen Records to the FBI by letter dated  
6 July 27, 2018; (d) the Receiver having subpoenaed the Pedersen Records from the FBI as it was  
7 instructed to do on or about August 2, 2018; and (e) the United States Attorneys’ Office having  
8 advised the Receiver that the Pedersen Records can be produced to the Receiver in unredacted  
9 form only in the event that the Receiver obtain a protective order from this Court; having heard  
10 and considered the arguments and contentions of counsel at the time of the hearing on the  
11 Application, and good cause appearing therefore, it is

12 **ORDERED** that the Application shall be and is hereby granted in its entirety; and

13 **IT IS FURTHER ORDERED** that:

14 1. All Pedersen Records produced to the Receiver in unredacted form by the FBI  
15 shall be used by the Receiver and its counsel solely to assist the Receiver in carrying out its duties  
16 and responsibilities as Receiver in this action.

17 2. In the event that the Receiver intends to disclose, produce, or file any of the  
18 Pedersen Records in connection with this action or for any other purpose, disclosure shall be  
19 permitted only after the Receiver or its counsel redact all personal identifying information as  
20 required by Rule 5.2 of the Federal Rules of Civil Procedure and Local Rule 5.2-1 of the United  
21 States District Court for the Central District of California.

22 3. The Receiver shall not disclose any personal identifying information contained in  
23 the Pedersen Records to anyone other than members and staff of the Receiver, including  
24 secretarial and clerical personnel thereof, and the Receiver’s counsel, including paralegal,  
25 secretarial and clerical personnel thereof.

26 4. Nothing in this Protective Order shall preclude any disclosure of the Pedersen  
27 Records to the Court for the purposes of this action and the Receiver carrying out its duties and  
28 responsibilities. In the event the Receiver determines that any Pedersen Records need to be filed

1 with the Court in an unredacted form that contain Personal Identifying Information, the Receiver  
2 shall file such documents "under seal" and delivered to the Court enclosed in a sealed envelope  
3 bearing the caption of this action, an indication of the nature of the contents, and designated  
4 "Subject to Protective Order," No unredacted Pedersen Records containing Personal Identifying  
5 Information are to be filed electronically with the Court.

6 5. The Receiver and its counsel shall maintain the Pedersen Records in a secure  
7 location.

8 Dated:

MICHAEL P. VICENCIA  
JUDGE

Honorable Michael P. Vicencia  
Judge of the Los Angeles Superior Court

and shall otherwise  
comply with California Rules of Court,  
Rule 2.550 et seq. MPJ