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Re: *Vasquez v. Kasparian, et al.*  
San Diego Superior Court Case No. 37-2016-00044511-CU-OE-CTL

*Naranjo v. UFCW Local 135, et al.*  
San Diego Superior Court Case No. 37-2016-00044084-CU-OE-CTL

*Arauz v. UFCW Local 135, et al.*  
San Diego Superior Court Case No. 37-2017-00013268-CU-WT-CTL

Dear Mr. Gilleon, Mr. Clemens and Mr. Corrales:

This letter confirms the message that I conveyed to Mr. Corrales this morning concerning the above-referenced cases. Defendants Kasparian and Local 135 will be appearing in on an *ex parte* basis in the *Vasquez* action at 8:30 a.m. on Wednesday, December 27, 2017 in Department C-62 of the San Diego Superior Court, located at 330 West Broadway, San Diego, California, to apply for an order shortening the time for notice of their motion for a protective order. This order would, if granted, permit the hearing of that motion in Department C-62 of the San Diego Superior Court, located at 330 West Broadway, San Diego, California, at 8:30 a.m. on Thursday, December 28, 2017.

The underlying Motion for Protective Order in *Vasquez* seeks to enjoin Plaintiff, her counsel, their agents and any other persons acting in concert with them or on their behalf during the pendency of said action from disseminating to third parties any information contained in any and all of the depositions taken in said case, including copies of the transcripts of said depositions and/or any portions thereof, except to disseminate such information solely for legitimate purposes related to said litigation, that is, in order to prepare and conduct further discovery in or the trial of said case,

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and then only to third parties having a legitimate interest in the information for such purposes.

This letter also confirms that Defendant Local 135 will also appear on an *ex parte* basis in the *Naranjo* action at 8:30 a.m. on Wednesday, December 27, 2017 in Department C-62 of the San Diego Superior Court, located at 330 West Broadway, San Diego, California, to apply for an order shortening the time for notice of its motion for a protective order. This order would, if granted, permit the hearing of that motion in Department C-62 of the San Diego Superior Court, located at 330 West Broadway, San Diego, California, at 8:30 a.m. on Thursday, December 28, 2017.

The underlying Motion for Protective Order in *Naranjo* seeks to enjoin Plaintiff, her counsel, their agents and any other persons acting in concert with them or on their behalf during the pendency of said action from disseminating to third parties any information contained in any and all of the depositions taken in said case, including copies of the transcripts of said depositions and /or any portions thereof, except to disseminate such information solely for legitimate purposes related to said litigation, that is, in order to prepare and conduct further discovery in or the trial of said case, and then only to third parties having a legitimate interest in the information for such purposes.

This letter also confirms that Defendant Local 135 will also appear on an *ex parte* basis in the *Arauz* action at 8:30 a.m. on Wednesday, December 27, 2017 in Department C-62 of the San Diego Superior Court, located at 330 West Broadway, San Diego, California, to apply for an order shortening the time for notice of its motion for a protective order. This order would, if granted, permit the hearing of that motion in Department C-62 of the San Diego Superior Court, located at 330 West Broadway, San Diego, California, at 8:30 a.m. on Thursday, December 28, 2017.

The underlying Motion for Protective Order in *Arauz* seeks to enjoin Plaintiff, her counsel, their agents and any other persons acting in concert with them or on their behalf during the pendency of said action from disseminating to third parties any information contained in any and all of the depositions taken in said case, including copies of the transcripts of said depositions and /or any portions thereof, except to disseminate such information solely for legitimate purposes related to said litigation, that is, in order to prepare and conduct further discovery in or the trial of said case, and then only to third parties having a legitimate interest in the information for such purposes.

The Ex Parte Applications and the moving papers for the Motions for Protective Order in each of the *Vasquez*, *Naranjo* and *Arauz* cases shall be sent to you today by separate emails.

Daniel M. Gilleon, Esq.  
Samuel A. Clemens, Esq.  
Manuel Corrales, Jr., Esq.  
December 22, 2017  
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Please do not hesitate to contact me by email or via telephone if you have any questions or wish to discuss this further.

Sincerely,

SCHWARTZ, STEINSAPIR, DOHRMANN  
& SOMMERS LLP



Michael R. Feinberg

MRF:lz

cc: Roger M. Mansukhani, Esq. (*via e-mail only*)  
Blake R. Jones, Esq. (*via e-mail only*)