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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

DO NO HARM et al.
Plaintiffs,
and
UNITED STATES OF
AMERICA,
Plaintiff-Intervenor,
v.
REGENTS OF THE UNIVERSITY
OF CALIFORNIA et al.,
Defendants.

Case No. 2:25-cv-4131-JWH-JDE

**STIPULATION REGARDING
CORRECTED AMENDED
PROTECTIVE ORDER**

1 STIPULATION AND REQUEST FOR ENTRY OF CORRECTED AMENDED
2 PROTECTIVE ORDER

3 WHEREAS, the Court previously entered a Protective Order in this action
4 [ECF No. 74] (the “Protective Order”);

5 WHEREAS, on February 23, 2026, the United States of America intervened
6 in this action and is now a party;

7 WHEREAS, the Protective Order was entered prior to the United States’ in-
8 tervention;

9 WHEREAS, in light of the United States’ intervention, the Parties agree that
10 the Protective Order should be amended to reflect the United States as a party to
11 this action;

12 WHEREAS, the Parties also agree that the Protective Order should be
13 amended to include language regarding the use of certain large language models
14 and generative AI tools;

15 WHEREAS, the Parties have jointly prepared an Amended Protective Order,
16 attached as Exhibit A;

17 WHEREAS, the Parties submitted a stipulation and proposed Amended Pro-
18 tective Order at ECF No. 93 that was inadvertently based on the Parties’ proposed
19 Protective Order at ECF No. 72, rather than the Protective Order entered by the
20 Court at ECF No. 74, and the Parties have now corrected the proposed Amended
21 Protective Order, attached as Exhibit A, to conform to the entered Protective Order
22 at ECF No. 74;

23 WHEREAS, the Parties have attached a redline showing the changes be-
24 tween the proposed amended Protective Order, and ECF No. 74, the Protective Or-
25 der currently in effect, as Exhibit B;

1 NOW, THEREFORE, the Parties, by and through their undersigned counsel,
2 hereby stipulate and respectfully request that the Court enter the attached Corrected
3 Amended Protective Order.

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5 IT IS SO STIPULATED, THROUGH THE UNDERSIGNED COUNSEL FOR
6 THE PARTIES.

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1 Dated: April 8, 2026

Respectfully submitted,

2 /s/ Felicia H. Ellsworth

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26 /s/ Patrick Strawbridge

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24 */s/ John P L Mertens*

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United States of America

ATTESTATION OF CONCURRENCE IN FILING

Pursuant to United States District Court for the Central District of California's Civil Local Rule 5-4.3.4(a)(2)(i), I hereby attest that all signatories to this document have concurred in this filing and have authorized this filing.

Dated: April 8, 2026

Felicia H. Ellsworth
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