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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

COLUMBIA PICTURES INDUSTRIES, INC.; AMAZON CONTENT SERVICES, LLC; DISNEY ENTERPRISES, INC.; PARAMOUNT PICTURES CORPORATION; WARNER BROS. ENTERTAINMENT INC.; UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP; UNIVERSAL TELEVISION LLC; and UNIVERSAL CONTENT PRODUCTIONS LLC,

Plaintiffs,

v.

ALEJANDRO GALINDO and DOES 1-20,

Defendants.

Case No. 2:20-cv-03129-SVW-GJSx

**[PROPOSED] ORDER  
COMPELLING DEFENDANT'S  
CONSENT TO PRODUCTION OF  
EMAILS BY GOOGLE**

Trial Date: October 13, 2020

1 This matter coming before the Court on Plaintiffs' motion requesting, among  
2 other things, an order compelling Defendant's consent to production of certain  
3 communications by Google LLC ("Google"), the Court FINDS good cause and  
4 ORDERS as follows:

5 1. Defendant Alejandro Galindo ("Defendant") is the registered account  
6 holder and/or sole authorized user of a Gmail account with the address  
7 fo\*\*\*\*\*@gmail.com ("Google Account").

8 2. Defendant consents to Google delivering and divulging the contents of  
9 his respective Gmail account as described further below. The court finds that this  
10 consent is sufficient pursuant to the Stored Communications Act 18 U.S.C § 2701 *et*  
11 *seq.*

12 3. Within ten (10) days of the entry of this Order, Defendant shall send an  
13 email message from the user's Gmail account listed above to google-legal-  
14 support@google.com with this Order attached ("Consent Email"). The Consent  
15 Email shall state that the user consents to Google's disclosure of the communications  
16 dated between January 1, 2015 to July 31, 2020 GMT/UTC associated with the  
17 Google Account, which are in the Google Account, were recently deleted from the  
18 Google Account, or were preserved pursuant to the request(s) in this matter (the  
19 "Documents").

20 4. The Consent Email shall further state that the user consents to Google  
21 delivering the Documents to Plaintiffs' counsel, Julie A. Shepard, at 633 West 5th  
22 Street Suite 3600 Los Angeles, CA 90071-2054 or via electronic delivery to her  
23 Jenner & Block email address or to a secured FTP site.

24 5. Within ten (10) days of the receipt of the Consent Email, Google shall  
25 write or otherwise record the Documents, to the extent any exist and are reasonably  
26 available, on a separate compact disc (CD) or other fixed medium and mail via  
27 overnight courier to: Julie A. Shepard, 633 West 5th Street Suite 3600 Los Angeles,  
28

1 CA 90071-2054. Alternatively, Google may produce the Documents via electronic  
2 delivery as specified in paragraph 4, above.

3 6. Google's production, as outlined in paragraph 6, will complete  
4 Google's discovery obligation with respect to this Google Account.

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6 IT IS SO ORDERED.

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8 Dated:

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By: \_\_\_\_\_

The Honorable Gail Standish  
Magistrate Judge

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