

1 **IT IS HEREBY ORDERED** that:

2 (a) The City of San Diego, its agents, and attorneys are hereby prohibited from any *ex parte*
3 contact with plaintiff representative class members—hereby defined as ‘the present and former
4 owners, tenants, residents, and occupants of the approximately 509 lots within the De Anza Harbor
5 Resort mobilehome park, located at 2727 De Anza Road, San Diego, California’—without prior
6 written consent of Plaintiff’s counsel or Court order;

7 (b) Within 7 calendar days of the entry of this Protective Order, the City of San Diego must
8 disclose to Plaintiff’s counsel the names, addresses, and telephone numbers of all plaintiff
9 representative class members that the City and its representatives communicated with since the time
10 the Court issued its Temporary Restraining Order on November 20, 2003;

11 (c) Within 14 calendar days of the entry of this Protective Order, the City of San Diego must
12 produce for inspection and copying to Plaintiff’s counsel all documents—including but not limited
13 to attorneys’ notes, memoranda, and settlement agreements—that constitute or refer to any
14 communication to or from any plaintiff representative class members since the time the Court
15 issued its Temporary Restraining Order on November 20, 2003;

16 (d) The enforcement of any and all settlement agreements entered into between the City of San
17 Diego and any plaintiff representative class members is hereby stayed for all purposes until further
18 hearings and order of the Court; and

19 (e) Plaintiff’s counsel shall draft a proposed special notice on the Court’s behalf to all plaintiff
20 class members. Upon the Court’s review and approval of said notice, the Court notice shall be sent
21 to all plaintiff class members, the cost of which shall be borne by the City of San Diego.

22 **IT IS SO ORDERED.**

23
24 Date: _____

JUDGE OF THE SUPERIOR COURT