

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

LEOLA MILBRY; as the Personal  
Representative of the Estate of EARLY  
MILBRY, deceased,

Plaintiff,

vs.

GGNSC Montgomery, LLC, et al.,

Defendant.

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NO. 2:07-cv-837-MEF  
(WO)

**AGREED PROTECTIVE ORDER**

COMES NOW Leola Milbry, as the Personal Representative of the Estate of Early Milbry, deceased, and GGNSC Montgomery, LLC, by and through undersigned counsel, and enter into this agreed protective order, showing unto the court the following:

1. The subject matter of this litigation related to the care and treatment given to Early Milbry by Tyson Manor.
2. Plaintiff has requested disclosure of certain information, including several of Tyson Manor’s Policy and Procedure Manuals.
3. Plaintiff has requested disclosure of certain information, including materials provided to employees in connection with training.
4. Defendant recognizes the legitimate discovery interest of Plaintiff, but desires protection, within the content of this litigation, from the disclosure of Defendants’ policy and procedure manuals and training materials to those outside the parameters of this litigation.

Accordingly, because of the above representations, the parties agree to the following

protective order:

1. The terms of this protective order shall apply to the Defendant's Policy and Procedure Manuals and training materials.
2. All material subject to this order shall not be reproduced or made available to anyone outside of this litigation, except to experts involved in this matter, and that all originals and all copies of this material will be returned to us at the conclusion of this matter and shall not be used in any other action against the named defendant in this action.

*/s W. Benjamin Broadwater*  
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So ordered.

Done, this 9th day of October, 2008.

/s/ Susan Russ Walker  
SUSAN RUSS WALKER  
CHIEF UNITED STATES MAGISTRATE JUDGE