

**UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO**

Civil Action No.: 12 cv 02221-RBJ

DARLENE M. LOMMEL

Plaintiff,

vs.

MARRIOTT INTERNATIONAL, INC., a Delaware corporation d/b/a
RENAISSANCE HOTELS; and SODEXO, INC., a Delaware corporation,

Defendants.

STIPULATION OF PROTECTIVE ORDER FOR CONFIDENTIALITY

IT IS HEREBY STIPULATED by and between the parties herein, through their respective attorneys of record, that the court may order plaintiff, and her attorneys of record, including those acting on plaintiff's behalf who have received the documents described herein below, to ensure that information contained in the documents is not made public, or common knowledge and shall remain confidential. By this stipulation, the court may order the following:

1. Pursuant to the stipulation by the parties in this matter, plaintiff and her attorneys of record agree that the information contained in the documents described as "Amended and Restated Administrative Services Agreement for the Renaissance London Chancery Court Hotel" between HPI and Renaissance and IHLC, "Assignment and Assumption of Amended & Restated Administrative Services Agreement" between HPI and HPI Chancery Court Hotel, Amended and Restated License Agreement for Renaissance London Chancery Court Hotel between HPI and Renaissance and IHLC, Assignment and Assumption of Amended and Restated License Agreement between HPI and HPI Chancery Court Hotel (hereinafter referred to collectively as "Confidential

Agreements") shall not be disclosed to third-parties, or members of the public and shall only be disclosed to those persons when necessary in relation to any matter before this court.

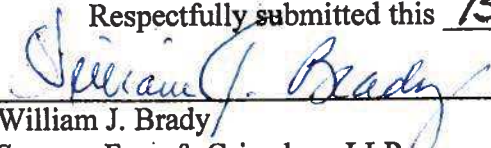
2. Plaintiff and her counsel may attach or reference the Confidential Agreements to permit the court to review the Agreements in consideration of defendants pending motions to dismiss.

3. Plaintiff and her attorneys of record shall not disclose any information contained in the Confidential Agreements except as is required to be disclosed by law, governmental order, rule, regulation or any other administrative process, by order of a court of competent jurisdiction, administrative agency, or governmental body.

4. Plaintiff and her attorneys of record shall, prior to disclosure of information contained in the Confidential Agreements make a reasonable effort to assert all available legal objections to production of the information, in good faith, such that in response to discovery demands by a party, or pursuant to court order, or tribunal with jurisdiction of the discovery process.

5. Any submission of the Confidential Agreements by plaintiff or her attorneys of record, to this court, or by order from another court, or tribunal shall be submitted under seal and marked confidential.

Respectfully submitted this 15th day of January 2013.



William J. Brady

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DATED at Denver, Colorado, on January 30, 2013.

BY THE COURT:



Craig B. Shaffer

United States Magistrate Judge