IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

Civil Action No. 1:14-cv-03370-KLM

HELEN STARR,

Plaintiff,

v.

WHOLE FOODS MARKET ROCKY MOUNTAIN/SOUTHWEST L.P.,

Defendant.

STIPULATED ORDER

The Parties, through undersigned counsel, have stipulated to the following:

The production of privileged or work-product protected documents, electronically stored information ("ESI") or information, whether inadvertently or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Stipulated Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

Nothing contained herein is intended to or shall serve to limit a party's right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness and/or segregation of privileged and/or protected information before production.

APPROVED:

/s/ John A. Cimino John A. Cimino, Esq., #14032

CIMINO & BENHAM, LLC 925 East 17th Avenue

Denver, Colorado 80218

Phone: (303) 813-0000

Email: JCimino2014@aol.com

Attorney for Plaintiff

/s/ Christopher P. Brown

Christopher P. Brown Esq, NEMIROW PEREZ, P.C.

445 Union Blvd. #209 Lakewood, Colorado 80228

Phone: (720) 638-1234

Email: cbrown@nemirowperez.com

Attorney for Defendant

DATED at Denver, Colorado, this <u>May</u> of <u>April</u>, 2015.

BY THE COURT:

U.S. District Court Magistrate Judge