

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 14-cv-03484-MSK-KLM

TYLENE E. HOLLINGSWORTH,

Plaintiff,

v.

ROBERT A. MCDONALD, Secretary of the Department of Veterans Affairs, in his official capacity,

Defendant.

STIPULATED ORDER REGARDING F.R.E. 502(d)

The production of privileged or work-product protected documents, electronically stored information ("ESI") or other 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.

BRYAN E. KUHN, COUNSELOR AT LAW, P.C. JOHN F. WALSH, United States Attorney

*Original pleading bearing original signature maintained
in the offices of Bryan E. Kuhn, Counselor at law, P.C.*

s/ Kate W. Beckman

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COUNSEL FOR DEFENDANT

Dated this 11th day of May, 2015.

BY THE COURT:



Honorable Kristen L. Mix
United States Magistrate Judge