IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

Civil Action No. 15-cv-00208-MSK-KLM

DAVID AND PATRICIA CASTRO

Plaintiffs,

٧.

ALLSTATE PROPERTY AND CASUALTY INSURANCE COMPANY

Defendant.

STIPULATED ORDER RE: FED. R. EVID. 502(d)

ENTERED BY MAGISTRATE JUDGE KRISTEN L. MIX

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.

Respectfully submitted this 23rd day of April 2015,

s/ Ross Ziev

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SO ORDERED

Dated: April 25, 2015

s/ Mark A. Sares

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Hon. Kristen L. Mix

United States Magistrate Judge