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

Civil Action No.: 1:15	5-CV-00278-CMA-KLM	
ERIC C. JONES,	}	
Plaintiff,	j	
vs.	}	
ESURANCE INSURANCE COMPANY,		9 <u>.</u> 4
Defendant.	}	

## STIPULATED ORDER PURSUANT TO FED. R. EVID. 502(d) REGARDING PRIVILEGED OR WORK PRODUCT-PROTECTED DOCUMENTS

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 Rule 502(d) of the FEDERAL RULES OF EVIDENCE.

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.

## Marc Harden

s/ Marc Harden

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Attorneys for Defendant Esurance Insurance Company

DATED this \_\_\_\_\_\_ day of \_\_\_\_\_\_\_, 2015.

BY THE COURT:

Hon. Kristen L. Mix

United States Magistrate Judge