IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

Civil Action No. 1:15-cv-01073-WJM-KLM

MEREDITH SMITH, INDIVIDUALLY, AND ELIZABETH PETTEY, A MINOR, BY AND THROUGH HER MOTHER AND NEXT FRIEND, MEREDITH SMITH,

Plaintiffs.

٧.

ALLSTATE FIRE 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.

s/ Maaren L. Johnson

Maaren L. Johnson. Esq. BACHUS & SCHANKER, LLC 1899 Wynkoop Street, Suite 700 Denver, CO 80202

Telephone: 303.893.9800 Facsimile: 303.893.9900 mjohnson@coloradolaw.net Attorneys for Plaintiffs

s/ Kurt H. Henkel

Kurt H. Henkel, Esq. TUCKER & HOLMES, P.C. 7400 East Caley Avenue Centennial, Colorado 80111 Telephone: (303) 694-9300 Facsimile: (303) 694-9370 khh@tucker-holmes.com Attorneys for Defendant

SO ORDERED

Dated: <u>Ayurt 5, 2015</u>

Hon Kristen L. Mix United States Magistrate Judge