IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

Civil Action No. 15-cv-01227-WYD-KLM

JETAIME ESQUIBEL,

Plaintiff.

٧.

MIDLAND CREDIT MANAGEMENT, INC., a Kansas corporation,

Defendant.

STIPULATED ORDER PURSUANT TO FED.R.EVID. 502(d)

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/ David M. Larson

David M. Larson, Esq. 88 Inverness Circle East, Suite E-102 Englewood, CO 80112 (303) 799-6895 Attorney for the Plaintiff s/ Joseph J. Lico

Joseph J. Lico, Esq. Adam L. Plotkin, PC 621 17th Street, Suite 1800 Denver, CO 80293 (303) 296-3566 Attorney(s) for the Defendant

SO ORDERED

DATED this 3rd day of October, 2015.

BY THE COURT:

Hon. Kristen L. Mix United States Magistrate Judge