

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

Case No. 1:15-cv-02084-KLM

BRETT CLATT,
BENJAMIN NEAL JENKINS,
JERRIME MATA SANCHEZ, and
JOHN WILLIAM THOMPSON,

Plaintiffs,

v.

COVIDIEN LP, a Delaware Limited Partnership,

Defendant.

STIPULATED ORDER

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 other information (including metadata) for relevance, responsiveness, or segregation of privileged or protected (or both) information before production.

Dated this 3rd day of February 2016.

APPROVED:

s/ Mathew S. Shechter

Todd J. McNamara
Mathew S. Shechter
1640 East 18th Avenue
McNamara, Roseman, & Kazmierski LLP
Denver CO 80218
Email: tjm@18thavelaw.com
mss@18thavelaw.com

ATTORNEYS FOR PLAINTIFFS

APPROVED:

s/ Joshua B. Kirkpatrick


Joshua B. Kirkpatrick
William E. Trachman
LITTLER MENDELSON, P.C.
1900 16th Street, Suite 800
Denver, CO 80202
Telephone: 303.629.6200
Email: jkirkpatrick@littler.com
wtrachman@littler.com

Andrew James Voss
LITTLER MENDELSON, P.C.
80 South Eighth Street, Suite 1300
Minneapolis, MN 55402
Telephone: 612-630-9625
Email: avoss@littler.com

ATTORNEYS FOR DEFENDANT

SO ORDERED

Dated: February 11, 2016



Honorable Kristen L. Mix
United States Magistrate Judge