

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 15-cv-02457-KLM

ABC MEDICAL HOLDINGS, INC. and
ABC HOME MEDICAL SUPPLY, INC.

Plaintiffs,

v.

HOME MEDICAL SUPPLIES, INC. and
RICK MODDERMAN

Defendants.

STIPULATED ORDER

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 January 26, 2016.

<p><u>s/ Martine T. Wells</u> Lisa Hogan Martine T. Wells BROWNSTEIN HYATT FARBER SCHRECK, LLP 410 Seventeenth Street, Suite 2200 Denver, Colorado 80202-4432 Telephone: 303.223.1100 E-mail: lhogan@bhfs.com; mwells@bhfs.com</p> <p>Precious M. Gittens Kelly A. Carroll HOOPER, LUNDY & BOOKMAN, P.C. 401 9th Street, NW, Suite 550 Washington, DC 20004-2141 Telephone: 202-580-7700 E-mail: pmgittens@health-law.com; kcarroll@health-law.com</p> <p><i>Attorneys for Plaintiffs ABC Medical Holding, Inc. and ABC Home Medical Supply, Inc.</i></p>	<p><u>s/ David O. Hansen</u> David O. Hansen KUMPF, CHARLESLEY & HANSEN, LLC 9635 Maroon Circle, Suite 230 Englewood, CO 80112 Telephone: (720) 473-8000 E-mail: dhansen@kch-law.com</p> <p>Scott T. Kannady BROWN & KANNADY, LLC 2000 S. Colorado Boulevard, Suite 2-440 Denver, CO 80222 Telephone: (303) 757-3800 E-mail: scott@brownlegal.com</p> <p>Michael C. Whitticar NOVA IP LAW, PLLC 7001 Heritage Village Plaza, Suite 205 Gainesville, VA 20155 Telephone: (571) 386-2980 E-mail: mikew@novaiplaw.com</p> <p><i>Attorneys for Defendant Home Medical Supplies, Inc.</i></p>
	<p><u>s/ Rick Modderman</u> Rick Modderman 10165 Highland Meadow Loop, #106 Parker, CO 80134 Telephone: (720) 442-1802 E-mail: rickmodderman@comcast.net</p> <p><i>Pro Se Defendant</i></p>

SO ORDERED

Dated: January 26, 2016


Hon. Kristen L. Mix
United States Magistrate Judge