

05415-R7304  
TMP/ej

IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF ILLINOIS

LEVAIL GIVENS, K57839,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 07-2229
	)	
ROGER E. WALKER, JR.;	)	
BASHIRAHMED AMEJI; MARSHALL	)	
KEYS; MARVIN COOLEY; and	)	
CHAPLAIN COLEMAN,	)	
	)	
Defendants.	)	

**MOTION FOR HIPAA QUALIFIED PROTECTIVE ORDER**

NOW COMES the Defendant, BASHIR AMEJI, M.D. (incorrectly referred to as “Bashirahmed Ameji”), by his attorney, THERESA M. POWELL of HEYL, ROYSTER, VOELKER & ALLEN, and moves the Court for the entry of a HIPAA Qualified Protective Order. In support thereof, Defendant states as follows:

1. Plaintiff has filed this cause of action in which the medical condition and treatment of Plaintiff, Levail Givens, is in issue.
2. Pursuant to 45 C.F.R. 164.512 of the Health Insurance Portability and Accountability Act (HIPAA) an HIPAA Qualified Protective Order is necessary to allow the parties to this litigation to obtain and use protected health information pursuant to HIPAA for the purpose of this litigation while preventing unauthorized disclosure of said protected health information.
3. That the attached HIPAA Qualified Protective Order (Exhibit A) should be entered to protect the protected health information from authorized disclosure while still permitting its use solely for purposes of this litigation.

**HEYL ROYSTER**  
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**& ALLEN**

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WHEREFORE, the Defendant, BASHIR AMEJI, M.S., respectfully moves the Court to enter the attached HIPAA Qualified Protective Order (Exhibit A) and for such other relief as the Court deems necessary.

Respectfully submitted,

BASHIR AMEJI, M.D., Defendant,

HEYL, ROYSTER, VOELKER & ALLEN,  
Attorneys for Defendant,

BY: /s/Theresa M. Powell  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 14, 2008, I electronically filed **Motion for HIPAA Qualified Protective Order** with the Clerk of Court using the CM/ECF system which will send notification of such filings(s) to the following:

Michael J. Lanzdorf  
[mlanzdorf@atg.state.il.us](mailto:mlanzdorf@atg.state.il.us)

and I hereby certify that on April 14, 2008, I mailed by United States Postal Service, the document(s) to the following non-registered participants:

Levail Givens, K57839  
Danville Correctional Center  
Inmate Mail/Parcels  
3820 East Main Street  
Danville, IL 61834

/s/Theresa M. Powell

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