

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

<b>STAURLA C. WAUN</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>Case No. 2:12-CV-02657-JTM/JPO</b>
	)	
<b>RUSSELL CELLULAR, INC.</b>	)	
	)	
<b>Defendant.</b>	)	

**JOINTLY PROPOSED PROTECTIVE ORDER**

**NOW** on this 13th day of March, 2013, the Court has before it the Jointly Proposed Protective Order of the parties. The Court makes the following findings:

1. When complying with Federal Rule 26 or when responding to discovery requests, the Plaintiff anticipates being required to produce Plaintiff’s financial and medical records and the Defendant anticipates being required to produce personnel records of its employees. Employees of Defendant may have a privacy interest in their personnel records and Plaintiff’s medical records and financial records are confidential in nature.

2. Due to the fact that personnel records of Defendant’s employees and Plaintiff’s financial and medical records are sensitive in nature, there is good cause to enter a protective order in accordance with Federal Civil Rule 26(c).

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED**, as follows:

A. This Protective Order only applies to the personnel records of Defendant’s current and former employees, Plaintiff’s medical records, Plaintiff’s financial records, and to any interrogatory answer which would require disclosure of personnel information of Defendant’s employees, of Plaintiff’s medical treatment, or of Plaintiff’s financial information.

B. The parties shall place a “Confidential” stamp on each page of the document deemed to be confidential or each page of the interrogatory answers deemed to be confidential relating to personnel information about Defendant’s employees, relating to Plaintiff’s medical information or relating to Plaintiff’s financial information.

C. The documents and/or interrogatory answers stamped “Confidential” produced by a party shall be used by the receiving party solely for the purposes of conducting this proceeding and shall not be disclosed or used for any other purpose, or in connection with any other litigation or proceeding, whether civil, criminal, administrative or investigative. Such documents and/or interrogatory answers shall not be viewed by or disclosed to any third parties, with the exception of any experts used by the parties, legal counsel, and staff, court personnel, and court reporters. The documents may be used as evidence at trial and may be disclosed to the jury at trial.

D. Within sixty (60) days of the resolution of this case, whether by final judgment or appeal, the party that received the documents marked “Confidential” shall return to the other party the documents provided herein and stamped “Confidential” or, alternatively, shall destroy the documents.

E. Should any provision herein be violated by any party to this stipulation, the Court, at its option, may enter appropriate sanctions against the violating party.

F. This Jointly Proposed Protective Order does not require that any document be placed under seal. Nor does it apply to non-parties.

**IT IS SO ORDERED.**

Dated March 13, 2013

s/ James P. O'Hara

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JAMES P. O'HARA  
UNITED STATES MAGISTRATE JUDGE

As stipulated:

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