

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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 JOHN W. GRIFFITHS, on behalf of himself :
 and all others similarly situated, :
 :
 Plaintiff, :
 :
 v. : Civil Action
 : No. 15-13022-NMG
 AVIVA LONDON ASSIGNMENT :
 CORPORATION, AVIVA LIFE INSURANCE :
 COMPANY, AVIVA INTERNATIONAL :
 INSURANCE LTD, f/k/a CGU :
 INTERNATIONAL INSURANCE, plc, :
 ATHENE HOLDING, LTD, ATHENE :
 LONDON ASSIGNMENT CORPORATION :
 and ATHENE ANNUITY AND LIFE :
 COMPANY, :
 :
 Defendants. :
 :
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**JOINT MOTION FOR ENTRY OF AN ORDER FOR THE
PROTECTION AND EXCHANGE OF CONFIDENTIAL INFORMATION**

Plaintiff and Defendants (together, the "Parties") hereby jointly move this Court for entry of an Order governing the protection and exchange of confidential information in this action in the form attached hereto as Exhibit A (to which the parties have stipulated).

As grounds for this Motion, the Parties state:

1. Discovery in this matter will involve disclosure of material that is contended by one or both Parties to be confidential information, including information that is non-public, confidential, proprietary or commercially sensitive information, or personal, financial, or other information protected under Federal Rule of Civil Procedure 26(c) ("Confidential Information").

*Joint motion allowed subject to the provisions of
Local Rule 7.2 GSM/Gorton, USDJ 8/10/16*