

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

DANIEL FLETCHER, #359391

Plaintiff,

v

Case No. 2:09-cv-13904
Hon. Robert H. Cleland
Mag. Judge R. Steven Whalen

MICHIGAN DEPARTMENT OF CORRECTIONS,
OAKLAND COUNTY JAIL, CENTER OF FORENSIC
PSYCHIATRY, SHERIFF MICHAEL BOUCHARD,
JOHN/SCOTT DOE (1), JOHN DOE (2), JOHN DOE (3),
JOHN DOE (4), JOHN DOE (5), JANE DOE,
DR. RITA GARG, THOMAS E. FLUENT, M.D.,
JOSEPH CORSO & BILL CLARK,

Defendants.

CRAIG S. ROMANZI & ASSOCIATES, P.C. HEIDI A. TANNER (P61953) CRAIG S. ROMANZI (P45549) Attorneys for Plaintiffs 2850 Dixie Highway Waterford, Michigan 48328 (248) 674-4404	WILLIAM G. PIERSON (P32119) Oakland County Corporation Counsel Attorneys for Defendants Oakland County Jail and Sheriff Michael Bouchard 1200 North Telegraph Road, Bldg. 14 East Pontiac, Michigan 48341-0419 (248) 858-0456
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**STIPULATED PROTECTIVE ORDER REGARDING
OAKLAND COUNTY SHERIFF'S OFFICE POLICIES AND PROCEDURES**

IT IS HEREBY STIPULATED, by and between the parties hereto, through their undersigned counsel, that Defendant Sheriff Michael Bouchard shall produce Policies and Procedures of the Oakland County Sheriff's Office, as requested by Plaintiff pursuant to this Protective Order that provides:

1. Any Policy and Procedures, Administrative Orders and/or Rules and Regulations (the Documents) of the Oakland County Sheriff's Office produced for inspection and/or copying by Plaintiff shall be used by Plaintiff and his counsel only for the purposes of this litigation and for no other purposes;

2. The Documents shall not be made public nor available to any person except:
 - a. Such attorneys and supporting staff of Plaintiff that are involved in litigating this action;
 - b. Any expert witness or consultant engaged by Plaintiff to assist in this litigation;
3. Nothing in paragraphs 1 and 2 shall prevent the parties from using the Documents received in discovery in any proceeding in this action including, but not limited to:
 - a. Discovery depositions
 - b. Motions, briefs and pleadings
 - c. Argument before the Court
 - d. Trial or appeal;
4. Counsel shall obtain the written agreement to abide by the terms of this Protective Order by any person being shown the Documents;
5. All Documents produced, including all copies, shall be returned to defense counsel at the conclusion of the litigation.

S/Robert H. Cleland
Hon. Robert H. Cleland
U.S. District Court Judge

We hereby stipulate to the above order:

/s/w consent - Heidi A. Tanner
Heidi A. Tanner (P61953)
Attorney for Plaintiff
2850 Dixie Highway
Waterford, MI 48328
(248) 674-4404
heidi@romoanziatnip.com

/s/ William G. Pierson
William G. Pierson (P32119)
Attorney for Defendant Sheriff Bouchard
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piersonw@oakgov.com

Dated: July 21, 2010