

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ALAN A. MAY, as Personal Representative
of the Estate of JESUS WINSTON
GILLARD, Deceased,

Plaintiff,

CA: 11-14453
HON: ROBERT H. CLELAND

-vs-

TOWNSHIP OF BLOOMFIELD, OFFICER JIM
GALLAGHER, OFFICER SEAN KELLEY, OFFICER
SCOTT MONKKONEN, OFFICER JASON MURPHY,
OFFICER JAMES SHOEMAKER, OFFICER APRIL
SWITALA, CITY OF TROY, OFFICER MICHAEL
MEINZINGER, OFFICER SEAN MORSE, OFFICER
CHRISTINA GIOVANNI, AND OFFICER MICHAEL
GIORDANO, Jointly and Severally,

Defendants.

_____/

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PROTECTIVE ORDER

The parties hereto having so stipulated, and the Court being otherwise fully advised in the premises,

IT IS HEREBY ORDERED as follows:

1. Any document produced by any party to this action (the "Producing Party") for inspection and/or copying by any other party (the "Discovering Party") shall be used by the Discovering Party only for the purposes of this litigation and for no other purpose. The Discovering Party shall not make such documents or the information contained therein available to any person except:

(a) Such employees of the Discovering Party as are involved in the prosecuting or defending of this action;

(b) Attorneys engaged or employed by the Discovering Party and their supporting staff;

(c) Any expert witness or consultant engaged by the Discovering Party or its attorneys to assist in connection with this action.

2. Nothing in paragraph 1 hereof shall prevent the parties from using documents received in discovery, or the information contained therein, 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.

3. Before making any documents produced herein, or the information contained therein, available to any person described in paragraph 1(c), the Discovering Party shall obtain from that person a written acknowledgment that he has been given a copy of this Order, has

read it, and agrees to be bound by all of its terms.

4. At the conclusion of this litigation, all documents, including copies, produced in discovery and in the possession of the Discovering Party or any other person to whom such documents were made available by the Discovering Party, shall be returned to the Producing Party or destroyed by the Discovering Party, at the option of the Producing Party. If the Producing Party elects the option of return, the postage for such return shall be paid by the Producing Party. If the Producing Party elects the option of destruction, the Discovering Party shall file and serve a sworn certificate of destruction, attesting to the Discovering Party's full compliance with the destruction requirement.

5. This Order may be modified upon written stipulation of the parties, or by the Court upon Motion of any party, for good cause shown.

Dated: July 20, 2012

s/Robert H. Cleland
U.S. DISTRICT COURT JUDGE

Stipulated and Agreed to by:

s/ Margaret T. Debler
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s/ Martin T. Shepherd (w/consent)
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