

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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JOHN DOES #1 – 4 and MARY DOE,

Plaintiffs,

Case No. 2:12-cv-11194

v.

HON. ROBERT H. CLELAND

RICHARD SNYDER, Governor of the State  
of Michigan, and COL. KRISTE  
ETUE, Director of the Michigan State  
Police, in their official capacities,

MAG. JUDGE DAVID R. GRAND

Defendants.

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**STIPULATION**

The parties hereby Stipulate and Agree:

1. On April 6, 2012, the Court entered its Order, upon the stipulation of the parties, extending the time to file Defendants' response to Plaintiffs' Motion to Proceed Under Fictitious Names to April 20, 2012.
  2. On April 18, 2012, the Court entered its Order granting Plaintiffs' motion.
  3. In light of the fact that the due date for Defendants' response to Plaintiffs' motion had not yet expired when the Court's Order was entered, counsel for the parties have conferred and agree that the Court's April 18, 2012 Order be vacated and that a stipulated Protective Order be entered in its place.
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**PROTECTIVE ORDER**

In order to protect the interests of the plaintiffs in this action, IT IS ORDERED:

1. That plaintiffs shall proceed anonymously in this action.
2. All documents filed with the Court which contain the names of the plaintiffs or information which identifies the plaintiffs or their family members, directly or indirectly, shall be filed under seal. In all publicly-filed documents, the plaintiffs shall be identified only by their pseudonyms.
3. The plaintiffs' counsel shall disclose the names of the plaintiffs to counsel for the defendants by May 1, 2012.
4. Counsel for the defendants may disclose the identities of the plaintiffs to the named defendants, employees of the defendants, and experts retained in this case, but only to the minimum extent necessary to litigate this action.
5. Individuals to whom disclosure of the plaintiffs' identities is made shall not further disclose that information to any other person without first obtaining confirmation from the defendants' counsel that such disclosure is necessary to litigate this action.
6. Any person to whom disclosure is made as a result of this litigation shall first read this protective order prior to having access to the identities of the plaintiffs. Counsel for the defendants shall ensure that all persons to whom disclosure is made pursuant to paragraph 3 and 4 are aware of this protective order.
7. Under no circumstances shall any person disclose the plaintiffs' names to the media without the consent of counsel for the plaintiff whose name is to be disclosed.
8. If any specific issues related to non-disclosure of the plaintiffs' identities arise during the course of litigation, the parties shall seek to resolve those issues without court intervention. If the parties cannot agree, they shall seek further clarification from this court.

**SO ORDERED.**

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

Dated: May 1, 2012

Stipulated and approved for entry:

s/Miriam Aukerman (w/consent)

Miriam Aukerman  
American Civil Liberties Union  
Fund of Michigan  
Attorney for Plaintiffs

s/Margaert A. Nelson (P30342)

Margaret A. Nelson  
Assistant Attorney General  
Attorney for Defendants