

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ZOLA H, et al.,

Plaintiffs,

-v-

RICK SNYDER, et al.,

Defendants.

Case No. 2:12-cv-14073

Hon. Robert H. Cleland
Magistrate Judge Laurie J. Michelson

STIPULATED PROTECTIVE ORDER

By agreement of the parties, for purposes of filing initial motions to dismiss and responses to same or replies to responses, it is hereby ORDERED that:

1. Any individually-identifiable information derived or ascertained from any document produced or other formal or informal disclosure made by a party to this case that concerns any minor child (under 19 years of age), such child's family members, foster family members, adoptive family members, birth family members, and persons included in any case files as a source of information concerning the child, including without limitation any names, addresses, telephone numbers, social security numbers, dates of birth, personal health information or records, including social history records, and other individual information likely to enable a reasonable member of the general public to ascertain the relevant person's identity (collectively, "Individually-Identifiable Information"), is hereby designated to be confidential and shall be subject to the provisions of this Order

2. The use of Individually-Identifiable Information by the parties and their counsel for any purpose other than the preparation and trial of this case or other proceedings related to this case, including but not limited to settlement discussions, is prohibited, except as modified by subsequent order of this Court.

3. Disclosure of Individually-Identifiable Information shall be limited to the parties, their counsel and staff and consultants employed by the parties or their counsel, including testifying experts and persons employed by experts, plus employees, agents, and/or representatives of insurers.

4. Any person to whom Individually-Identifiable Information is disclosed under the terms of this Order shall be provided a copy of this Order and is specifically directed not to reveal such information for any purpose other than as permitted by this Order.

5. If Individually-Identifiable Information is used during depositions or in pleadings, briefs, affidavits or other filings, the relevant portions of deposition transcripts, deposition exhibits, pleadings, briefs, affidavits and other documents shall be treated as confidential in accordance with this Order and redacted or sealed prior to filing.

6. If Individually-Identifiable Information is to be used during trial or in any other evidentiary hearing in this case, the relevant portions of any exhibits, testimony, and other evidentiary submissions shall be treated as confidential and redacted or sealed in a manner consistent with this Order and any subsequent order governing the treatment of Individually-Identifiable Information in this case.

7. Defendants stipulate and agree to this Order without waiving any legal rights or defenses they may possess in relation to opposing Plaintiffs' pending complaint. Plaintiffs

stipulate and agree that they shall not use this Order as a basis for asserting any waiver by Defendants regarding any legal rights or defenses Defendants may possess in relation to opposing Plaintiffs' pending complaint.

8. This Order shall not apply to or prohibit the disclosure or dissemination of information other than Individually-Identifiable Information, including without limitation documents produced by a party to this action that, as redacted or otherwise altered, are not individually-identifiable.

9. This Order is intended to cover documents that the parties may wish to file in connection with their initial motions, responses and replies. It is not intended to identify and cover all documents that require protection that may be requested or produced in discovery.

s/Robert H. Cleland
United States District Judge

I hereby certify that a copy of the foregoing document was served upon counsel of record on February 12, 2013, by electronic and/or ordinary mail.

s/Lisa Wagner
Case Manager

AGREED TO AND APPROVED FOR ENTRY:

 /s/ David A. Kallman

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