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

## LOUIS LEONOR, DDS,

Plaintiff,

v.

Case No. 2:12-cv-15343

PROVIDENT LIFE AND ACCIDENT COMPANY, a Tennessee Corporation; and PAUL REVERE LIFE INSURANCE COMPANY, a Massachusetts Corporation,

Hon. Robert H. Cleland

Defendants.

Michael M. Jacob (P15391)
Jeffrey D. Wilson (P56376)

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Attorneys for Defendants

## STIPULATED PROTECTIVE ORDER AS TO DOCUMENTS PRODUCED BY PLAINTIFF AND OTHER DOCUMENTS

At a session of said Court held in the
United States District Court, Eastern District of Michigan,
On December 5, 2013
Present: Honorable Robert H. Cleland
United States District Court Judge

Defendants having served its First Request for Production of Documents and Interrogatories dated August 9, 2013, Plaintiff having produced documents in response to said discovery requests, and the Court being fully advised in the premises.

## IT IS HEREBY ORDERED:

- 1. Until further Order of this Court, the foregoing documents produced by Plaintiff shall be deemed to be CONFIDENTIAL and not be disclosed in any way, directly or indirectly, in any form, to anyone other than in connection with this case, and then only to the following persons:
  - a. The Court and its staff assigned to this case;
  - b. The parties (whether or not dismissed at any time);
  - c. Counsel of record in this case and their respective partners, associates, legal assistants, and staff employees who are involved in this case;
  - d. Independent experts, investigators, consultants, and the like, retained by any party in connection with this litigation;
  - e. Persons deemed by counsel of record, whether or not a party, witness or deponent, necessary to effectively represent their respective client(s) in this litigation
- 2. Until further Order of this Court, (a) the foregoing documents produced by Plaintiff, (b) any of the documents previously produced by Defendants in response to Plaintiff's First Requests for Admission and for Production of Documents identified in the Stipulated Protective Order (Dkt # 22)

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and (c) any of the documents in Defendants' files and records, which in any way

relate or refer to Plaintiff's personal, financial and medical information shall be

marked "CONFIDENTIAL" and filed under seal and in such a manner as not to be

made available in the public record.

3. Any person who is permitted by counsel to view and/or retain a copy

of any documents covered by this Protective Order shall be provided with a copy

of this Protective Order and shall, by receiving a copy of same and viewing and/or

retaining such documents, agrees to be bound by the terms hereof and shall

acknowledge the same in writing with a copy to opposing counsel.

4. At any time, either Plaintiff or Defendants may apply to this Court for

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an Order excluding specific documents from the protection of this Order.

SO ORDERED

s/Robert H. Cleland

United States District Court Judge

APPROVED AS TO FORM AND SUBSTANCE NOTICE OF ENTRY WAIVED

Stipulated and agreed to:

By: /s/ Michael M. Jacob

Michael M. Jacob (P15391)

Attorney for Plaintiff

By: /s/ K. Scott Hamilton

K. Scott Hamilton (P44095)

Attorney for Defendants

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