

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

RONALD KING, JR,

Plaintiff,

Case No. 15-cv-14506
Hon. Matthew F. Leitman

v.

WAL-MART STORES EAST, LP,

Defendant.

STIPULATED PROTECTIVE ORDER UNDER FED. R. CIV. P. 26(c)(1)

This matter having come before this Honorable Court by stipulation of the parties, and the Court being otherwise fully advised in the premises:

IT IS HEREBY ORDERED that any and all materials and information, including, but not limited to, store policies and procedures, insurance information, and employee information provided to Plaintiff Ronald King by Defendant Wal-Mart Stores East, LP (“Wal-Mart”) during the course of this litigation will be subject to the following conditions:

1. The above-described materials will be used solely for purposes of this lawsuit and in compliance with the Federal Rules of Civil Procedure and Federal Rules of Evidence.

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2. All information in the above-described materials shall be used only for purposes of this lawsuit and not for any other purpose.

3. This Order shall survive the final termination of this action. Upon termination of this case, counsel for the parties shall assemble and return to each other all information designated as confidential or attorneys' eyes only and all copies of same, or shall certify the destruction thereof. The Court shall retain jurisdiction to entertain such further proceedings and to enter further orders and judgments as may be necessary or appropriate to implement and/or enforce the provisions of this Order.

4. The parties agree to return all documents and/or materials produced by Wal-Mart that are subject to the Protective Order within fourteen (14) days of entry of the Order of Dismissal of this lawsuit.

5. Any and all information and/or materials produced in this regard may not be duplicated, forwarded, filed with court, shared, published and/or disclosed in any manner or form with any other person and/or entity for any reason, without the consent of Wal-Mart.

6. This Order does not authorize the filing of any documents under seal. Documents may be sealed only if authorized by statute, rule, or order of the Court. A party seeking to file under seal any paper or other matter shall file and serve a

motion that sets forth (i) the authority for sealing; (ii) an identification and description of each item proposed for sealing; (iii) the reason that sealing each item is necessary; (iv) the reason that a means other than sealing is not available or is unsatisfactory to preserve the interest advanced by the movant in support of the seal; and (v) a memorandum of legal authority supporting the seal.

/s/Matthew F. Leitman
MATTHEW F. LEITMAN
UNITED STATES DISTRICT JUDGE

Dated: April 14, 2016

We consent to entry of the above Order:

/s/Gary Wm. Baun
GARY W. BAUN (P28758)
Attorney for Plaintiff

/s/Nicole M. Wright
NICOLE M. WRIGHT (P63513)
Attorney for Defendant