

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ROBERT Z. DAVIS,

Plaintiff,

Case No. 10-13425

Hon. Mark A. Goldsmith

v.

WAYNE STATE UNIVERSITY and  
WAYNE STATE UNIVERSITY PHYSICIANS GROUP,

Defendants.

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WAYNE STATE UNIVERSITY  
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**STIPULATED PROTECTIVE ORDER**

This matter having come before the Court upon the stipulation of the parties, wherein they seek a Protective Order preserving the confidentiality of certain documents produced in this litigation, and the Court having reviewed the parties' stipulation and being fully advised in the premises;

**NOW, IT IS HEREBY ORDERED:**

1. All records of the kind referenced below, shall be protected by this Order and may be used solely in connection with the instant litigation. This applies to the documents themselves, and the information contained in the documents.

- a. Plaintiff's tax returns and schedules,
- b. Plaintiff's medical records, and
- c. Defendants' corporate documents.

2. The parties shall not make any such confidential document, or the information contained therein, available to any person except:

- a. Attorneys engaged or employed by the parties in the litigation of this action;
- b. Support staff for the attorneys referenced in 2(a) as deemed necessary by the attorneys for preparation and use during litigation;
- c. Mediators, facilitators, arbitrators, or case evaluation panels and their staff;
- d. Expert witnesses consulted or retained by a party; or
- e. As otherwise provided in this or further Orders of the Court.

When any documents are disclosed to the above described persons, the attorneys shall advise such persons that the documents are confidential and subject to the terms of this Order and shall provide such persons with a copy of this Order together with the disclosed documents.

3. Nothing in Paragraph 2 (with the exception of the Court's determination in accordance with Paragraph 4) shall prevent the parties from using the confidential documents, or information contained therein, at any proceeding in this action such as, but not limited to:

- a. Discovery depositions;

- b. Motions, briefs and pleadings;
- c. Any form of facilitative mediation;
- d. Argument before the Court; and
- e. Trial or appeal.

4. The parties are bound by the Rules governing the redaction of electronically filed records, including Social Security numbers, names of minor children, financial account numbers, and dates of birth.

5. Upon the conclusion of this action by settlement, trial, any appeal therefrom, or upon further Order of the Court, all such documents shall remain confidential and cannot be used by the parties for any manner inconsistent with this Order.

**SO ORDERED.**

Dated: December 20, 2010

s/Mark A. Goldsmith  
MARK A. GOLDSMITH  
United States District Judge

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was served upon counsel of record and any unrepresented parties via the Court's ECF System to their respective email or First Class U.S. mail addresses disclosed on the Notice of Electronic Filing on December 20, 2010.

s/Deborah J. Goltz  
DEBORAH J. GOLTZ  
Case Manager

We hereby stipulate to the content and form  
of the above Order.

/s/ Karen S. Kienbaum  
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