

**EXHIBIT A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BUTTE DIVISION

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WENDY TOLLIVER-MCGREGOR,

*Plaintiff,*

v.

HEALTH CARE SERVICE  
CORPORATION, an Illinois Mutual  
Legal Reserve Company d/b/a BLUE  
CROSS AND BLUE SHIELD OF  
MONTANA,

*Defendant.*

Case No. 2:16-cv-00058

**AGREEMENT TO BE BOUND  
BY PROTECTIVE ORDER**

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1. I am familiar with and agree to be bound by the terms of the Agreed Protective Order in Case No. 2:16-cv-00058, *Tolliver-McGregor v. Health Care Service Corporation*, pending in the United States District Court for the District of Montana.

2. I will only make such copies of or notes concerning documents designated "Confidential" as are necessary to enable me to render the assistance required in connection with this litigation, and, all such notes and copies shall be

preserved in a separate file maintained as "Confidential" and marked for disposal or destruction upon completion of this litigation. Upon the final determination of this action, I shall promptly destroy all "Confidential" materials provided to me as well as any notes or derivations thereof.

3. I will not intentionally reveal the contents of "Confidential" material to any unauthorized person. I will not intentionally use "Confidential" material for any purpose other than the prosecution or defense of claims in this action.

4. I consent to the jurisdiction of the United States District Court for the District of Montana for the purpose of enforcing the terms of the Protective Order.

DATED this \_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_.

BY: \_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Printed Name)