

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

MEE MEE BROWN, )

Plaintiff, )

v. )

COURTNEY PHILIPS, Director, )

SHANNON BLACK, Program )

Director, KYLE MALONE, SOS )

Team Leader, WILLIAM BECKER, )

Program Therapist, CINDY )

DYKEMAN, Program Manager, and )

LISA LAURELL, Program Social )

Worker, et al., )

Defendants. )

8:16CV377

**PROTECTIVE ORDER**

THIS MATTER came on for consideration upon the Joint Stipulation for Protective Order (Filing No. [54](#)). The Court finds that said Joint Stipulation should be approved.

**IT IS THEREFORE ORDERED, ADJUDGED AND DECREED:**

1. This Order pertains to certain records of the Nebraska Department of Health and Human Services (DHHS) which have been requested by Plaintiff in the discovery process.
2. The confidentiality of the information is protected by various state laws, including Neb. Rev. Stat. § 83-109.
3. The above-identified records of DHHS and any copies thereof shall be utilized by the parties in connection with discovery, pretrial proceedings, preparation

for trial, trial, appeal and/or settlement, and for no other purpose, and shall not be disseminated, published, shown or otherwise disclosed to any person or entity except as provided herein.

4. All persons to whom the records are disclosed pursuant to this Order shall:
  - a. Be responsible for keeping such control over said records so as to ensure said records are not lost, misplaced or inadvertently disclosed.
  - b. Not reveal the contents of the records to any person not subject to the terms of this Order.
  - c. Not reveal or use the contents of the records except for purposes set forth in Paragraph 3 above.
5. The records or any information contained therein shall be treated as confidential pursuant to the terms of this Order.
6. After this action is terminated by the entry of a final and no-further-appealable order, the records and the information contained therein shall not thereafter be disclosed to any third party and shall be returned to the agency which provided said records or otherwise destroyed.
7. Before the parties disclose any records specified in this joint stipulation to an expert, counsel shall first provide a copy of the court's protective order to such expert, and shall inform the expert of the following:
  - a. The expert must review the order.
  - b. The confidentiality of DHHS records is protected by various Nebraska statutes.

- c. The expert must comply with the provisions of the court's protective order.
8. This order is to remain in force until and unless modified by the Court for good cause shown.

DATED this 15th day of August, 2017.

BY THE COURT:  
*s/ Richard G. Kopf*  
Senior United States District Judge