

BullivantHouser|Bailey PC

3883 Howard Hughes Parkway, Suite 550
Las Vegas, Nevada 89169
Telephone: 702.669.3600
Facsimile: 702.650.2995

1 Richard Dreitzer
Nevada Bar No. 6626
2 E-Mail: richard.dreitzer@bullivant.com
Kristol Bradley Ginapp
3 Nevada Bar No. 8468
E-Mail: kristol.ginapp@bullivant.com
4 BULLIVANT HOUSER BAILEY PC
3883 Howard Hughes Parkway, Suite 550
5 Las Vegas, Nevada 89169
Telephone: 702.669.3600
6 Facsimile: 702.650.2995
7 Attorneys for Defendant
Hartford Life and Accident Insurance Co.
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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 DONNA LISK,

12 Plaintiff,

13 v.

14 HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY, a Connecticut
15 corporation,

16 Defendant.

Case No.: 2:09-cv-1077-JCM-(LRL)

**THE PARTIES' STIPULATION FOR
PROTECTIVE ORDER AND XXXXXXXX
PROTECTIVE ORDER**

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19 Plaintiff Donna Lisk and defendant Hartford Life and Accident Insurance Company
20 stipulate as follows:

21 1. In the course of this lawsuit, both parties anticipate conducting discovery into
22 areas and issues that will include the disclosure of documents and information that each party
23 contends is confidential, including, but not limited to information regarding Hartford's business
24 operations.

25 2. In order to facilitate the production of those documents, and to facilitate any
26 future production of other documents requested, the parties agree that production may be made
27 pursuant to a protective order containing the terms set forth in the (Proposed) Protective Order
28 below.

1 DATED: 10/12/10

2 BULLIVANT HOUSER BAILEY PC

3
4 By /s/ Richard Dreitzer
Richard Dreitzer
Nevada Bar No. 6626
5 Kristol Bradley Ginapp
Nevada Bar No. 8468
6 3883 Howard Hughes Parkway, Suite 550
Las Vegas, Nevada 89169
7 Telephone: 702.669.3600
8 Facsimile: 702.650.2995

9 Attorneys for Defendant
Hartford Life and Accident Insurance Co.

10 DATED: 10/12/10

11 LAW OFFICES OF STEVEN J. PARSONS

12
13 By /s/ Steven J. Parsons
Steven J. Parsons
Nevada Bar No. 363
14 7201 W. Lake Mead Blvd., Ste. 108
Las Vegas, Nevada 89128-8354
15 Telephone: 702.384-9900
16 Facsimile: 702.384-5900

17 Attorney for Plaintiff
Donna Lisk

18 **(PROPOSED) PROTECTIVE ORDER**

19 The parties having stipulated and good cause appearing,

20 IT IS HEREBY ORDERED:

21 1. Defendant Hartford Life and Accident Insurance Company ("Hartford") may
22 designate as subject to this Protective Order, those documents it produces it contends are
23 confidential.

24 2. Plaintiff Donna Lisk ("Lisk") may also designate as subject to this Protective
25 Order, any documents she produces in the future which she contends are confidential.

26 3. Each page of any document designated by Hartford or Lisk as subject to this
27 Protective Order shall be marked "Confidential." Any document or page not so marked shall
28 not be subject to this Protective Order.

1 4. Documents subject to this Protective Order may be disclosed to counsel for the
2 parties to this case, their employees, experts and consultants retained by counsel and to the
3 parties to this case themselves. Those documents shall not be disclosed to any other person or
4 entity in paper or electronic format without the written consent of the producing party or further
5 order of the court, except as provided in paragraphs 5, 6, and 7 below.

6 5. XXX
XXXXXXXXXXXXXXXXXXXX

7 ***SEE END OF ORDER FOR NEW PARAGRAPH 5.

8 XXX

9 6. Documents subject to this Protective Order may be used at trial subject to any
10 restrictions which the court determines are appropriate at the time of trial.

11 7. Prior to delivery of any documents subject to this Protective Order to any of the
12 parties or to experts or consultants retained by any of the parties, counsel delivering such
13 documents shall provide a copy of this Protective Order to the party receiving the documents.

14 8. Nothing in this Protective Order shall prevent any of the parties to this action
15 from moving to have the Court declare that any or all of the documents subject to this Protective
16 Order are non-confidential and may be disclosed to third parties without restriction. Nothing in
17 this Protective Order shall prevent the Court from declaring on its own motion that any or all of
18 the documents subject to this Protective Order are non-confidential and may be disclosed to
19 third parties without restriction. Nothing in this Protective Order shall constitute an admission
20 by either party that any of the documents identified by the other party as "Confidential" are in
21 fact confidential.

22 9. At the conclusion of this matter, counsel for all parties shall return all copies of
23 the documents subject to this Protective Order to counsel for the party producing them with the
24 exception of those documents that are altered by counsel and are subject to the attorney work-
25 product doctrine, which shall be destroyed in such a manner as the contents of the documents
26 subject to the protective order are illegible. However, and to the extent necessary to preserve
27 his file for the defense of a claim brought for professional responsibility purposes or
28 professional negligence, either by his client or by a regulatory entity, Plaintiff's counsel shall be

1 permitted to maintain indefinitely a copy of the documents controlled by this Order. The
2 documents retained by Plaintiff's counsel for this purpose shall continue to be subject to the
3 provisions of this Order indefinitely.

4 ***5. Documents subject to this Protective Order may be offered in connection
5 with non-dispositive pre-trial motions in this matter. Any document subject to this
6 Protective Order which is offered in connection with such pre-trial motion in this matter
7 shall be filed under seal. However, any document subject to this Protective Order
8 which is offered in connection with a dispositive pre-trial motion shall not be filed under
9 seal without the express approval of the court.

8 IT IS SO ORDERED.

9 DATED THIS 22nd day of October, 2010.

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U.S. MAGISTRATE JUDGE