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 LIFE COMPANY OF NEW YORK and WEST COAST
 12 LIFE INSURANCE COMPANY

13 UNITED STATES DISTRICT COURT
 14 DISTRICT OF NEVADA

16 ROSEBERRY FAMILY TRUST, by and through
 its Trustee Robert Roseberry,

CASE NO. 2:10-cv-0903-JCM-RJJ

17 Plaintiff,

**STIPULATION FOR PROTECTIVE
 ORDER**

18 vs.

19 OMNI ADVISOR GROUP, INC., a North
 20 Carolina corporation; SI100, LLC a North
 Carolina limited liability company; BRIAN
 21 PATRICK McGUANE, individually; Briane
 McGuane, as Trustee of the SI 100 TRUST;
 22 LINCOLN NATIONAL LIFE INSURANCE
 COMPANY, an Indiana corporation; WILTON
 23 REASSURANCE LIFE COMPANY OF NEW
 YORK, a New York corporation;
 24 TRANSAMERICA LIFE INSURANCE
 COMPANY, an Iowa corporation; WEST COAST
 25 LIFE INSURANCE COMPANY, a Nebraska
 corporation; JOHN DOES I-X, inclusive; and ROE
 26 ENTITIES I-X, inclusive,

27 Defendants.

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1 **STIPULATION FOR PROTECTIVE ORDER**

2 This Agreement ("Agreement") is made this 20 day of SEPTEMBER,
3 2010, by and among counsel for Plaintiff, the ROSEBERRY FAMILY TRUST (the "Trust") and
4 Defendants, WILTON REASSURANCE LIFE COMPANY OF NEW YORK and WEST
5 COAST LIFE INSURANCE COMPANY (collectively as "Defendants") (and the Trust and the
6 Defendants are hereinafter referred to collectively as the "Parties"), each with the full express
7 authority and consent of their respective clients to enter into and thereby bind such clients by this
8 Agreement .

9 WHEREAS, certain documents and other materials sought and to be sought by the
10 Parties in this action (the "Litigation") may contain sensitive, confidential, medical, financial,
11 private and/or proprietary commercial, personal and trade secret information ; and

12 WHEREAS, the Parties wish to proceed with the production of the Confidential
13 Materials (as that term is defined below) with suitable assurances of confidentiality.

14 NOW, THEREFORE, in consideration of the mutual promises contained herein
15 and intending to be legally bound hereby, it is stipulated among the Parties that the above-
16 referenced documents will be produce subject to the following provisions:

17 1. That the documents only be utilized for the purposes of the above-
18 captioned matter and only be made available to the Parties, along with their counsel and any
19 expert retained;

20 2. Should any pleadings or filings include as an exhibit the above referenced
21 documents, said pleading or filing will be filed under seal with the Court to protect the integrity
22 of the information found within the above referenced documents;

23 3. That upon completion of this case either through settlement or after trial,
24 the Parties agree to return all originals and copies made of the above referenced documents,
25 whether originals or copies are held by the specific party, their counsel, or their experts or
26 witnesses that maybe testifying on that party's behalf. Said original and copies should be returned
27 to counsel for ~~Transamerica Life Insurance Company~~ ^{DEFENDANTS} through their undersigned counsel; and

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1 4. That any additional party named subsequent to this Stipulation, or entering
2 appearance subsequent to this Stipulation, will only be provided the above-referenced documents
3 after signing an addendum or amended stipulation to include that party prior to receiving an
4 copying the above referenced documents.

5 Dated: September 20, 2010

 Dated: September 17, 2010

6 CHRISTENSEN JAMES & MARTIN

 McCORMICK, BARSTOW, SHEPPARD,
 WAYTE & CARRUTH LLP

7
8
9 By: 

 By: 

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 WILTON REASSURANCE LIFE
 COMPANY OF NEW YORK and WEST
 COAST LIFE INSURANCE COMPANY

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17 IT IS SO ORDERED.



 UNITED STATES MAGISTRATE JUDGE
 SEPTEMBER 27, 2010