

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ELSA GULINO, MAYLING RALPH, PETER WILDS, :
and NIA GREENE, on behalf of themselves and all others :
similarly situated, : 96 Civ. 8414 (KMW)

Plaintiffs, :

- against - :

THE BOARD OF EDUCATION OF THE CITY SCHOOL :
DISTRICT OF THE CITY OF NEW YORK, :

Defendant. :
----- X

**STIPULATION AND
PROTECTIVE
ORDER**


WHEREAS, plaintiffs and defendant (the “parties”) entered into a Stipulation and Protective Order, which the Court so-ordered on March 31, 2000, as to the treatment of certain “Confidential Materials” produced in this action (the “March 2000 Protective Order”);

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the parties, as follows:

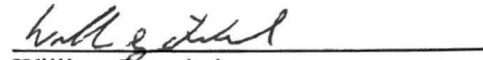
1. The parties agree that the phrase “Confidential Materials,” as such phrase appears and is defined in the March 2000 Protective Order, shall include any information, in any format, that the parties receive, either directly or via an intermediary, from an “Affected System,” as that term appears and is defined in the parties’ Pension Stipulation and Order, which the Court so-ordered on December 17, 2018 [ECF No. 1014], regardless of the method utilized by the parties to seek such information from an Affected System.

2. This Stipulation and Protective Order shall be deemed effective as of the first date any party received any such Confidential Information in this matter.

Dated: August 30, 2021
New York, New York


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Counsel for Defendant

SO ORDERED.

Dated: August 31, 2021

/s/ Kimba M. Wood
KIMBA M. WOOD
United States District Judge