IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION CIVIL ACTION NO. 3:11-CV-87-DCK

RUTH DMONDI,	,
)
Plaintiff,)
)
v.)
)
CARDINAL HEALTH 414, LLC, a/k/a)
CARDINAL HEALTH 414, INC.,)
)
Defendant.)
)

STIPULATED PROTECTIVE ORDER

Plaintiff Ruth Dmondi and Defendant Cardinal Health 414, LLC hereby stipulate and agree as follows, and further request that the Court sign this Stipulated Protective Order:

- 1. The parties anticipate that discovery in this matter may include medical, psychological, health, pharmaceutical, or mental health records, as well as tax records, related to the plaintiff or possibly other individuals. For purposes of this Protective Order, all such information shall be deemed "Protected Information."
- 2. Protected Information that is received by a party solely because it has been produced by the other party or by a nonparty during this litigation shall not be used by the receiving party for any purpose other than the above-captioned litigation or any related legal proceeding or appeal. At the conclusion of this litigation or of any related legal proceeding or appeals, all such Protected Information (including all copies thereof) shall be destroyed or returned to the entity that provided it, or otherwise disposed of in accordance with the final order of the Court.
- 3. Protected Information that was already accessible to a party before this litigation began or that was already in a party's possession before this litigation began or that relates to a party

(regardless of when the information was obtained) shall not be subject to the restrictions in section

2 for that particular party.

STIPULATED TO AND AGREED BY:

s/Geraldine Sumter

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IT IS SO ORDERED.

s/Jeremy R. Sayre

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Attorneys for Defendant

Signed: April 12, 2012

David C. Keesler United States Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2012, the foregoing was electronically filed and served via the Court's ECF system upon counsel for plaintiff:

Geraldine Sumter FERGUSON STEIN CHAMBERS GRESHAM & SUMTER, PA 741 Kenilworth Ave., Suite 300 Charlotte, NC 28204

s/Jeremy Sayre
Jeremy Sayre