

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

DIANNA HESS,)
)
 Plaintiff,)
)
 v.) CASE NO.: 1:12-cv-00983-TSB
)
 MILLER PIPELINE CORPORATION)
 and STEVE FARRELL,)
)
 Defendants.)

STIPULATION AND ORDER OF CONFIDENTIALITY

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and the Defendants, by and through their undersigned counsel, that information produced or disclosed by the Defendants in response to Plaintiff's written discovery requests and in the course of any depositions taken in this matter that refers or relates to financial information concerning Miller Pipeline Corporation, information concerning Miller Pipeline Corporation's present or former employees, and/or to Miller Pipeline Corporation's policies, practices or procedures, is and shall remain confidential information that shall be utilized solely in connection with the above-captioned matter by:

- (1) the Court, Court personnel and, if applicable, the Jury;
- (2) the parties and their attorneys of record, other attorneys acting "of counsel" for the parties in this action provided said attorneys are shown a copy of this Stipulation and agree to be bound by same, and persons employed in said attorneys' offices who likewise are shown a copy of this Stipulation and agree to be bound by same;

(3) persons retained in this action to assist in the prosecution or defense of this action, including experts and persons employed and affiliated with such experts, provided that said persons are shown a copy of this Stipulation and agree to be bound by same; and

(4) witnesses and potential witnesses in this litigation.

Nothing in this Stipulation constitutes an admission or agreement that any document or information is subject to discovery or is admissible as evidence in this case, and nothing in this Stipulation shall be construed to prohibit or limit the parties' attorneys from seeking to mark or introduce confidential information at, or utilize confidential information to prepare for, any deposition taken in, or at the trial of, this action.

Respectfully submitted this 12th day of June, 2013.

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SO ORDERED:

Timothy S. Beck, U.S.D.J.

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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