

HONORABLE ROBERT L. LASNIK

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SHADDE GHNEIM, an individual,

Case No. 2:17-cv-01117 RSL

Plaintiff,

v.

STIPULATION AND
RULE 502(d) ORDER

CELLCO PARTNERSHIP, d/b/a Verizon
Wireless, a Delaware partnership,

Defendant.

I. STIPULATION

The parties stipulate and agree that the production of privileged or work-product protected documents, electronically stored information (“ESI”) or other information, whether inadvertent or otherwise, should not constitute a waiver of the privilege or protection from discovery in this case or in any other proceeding. The Court’s Order should be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d). Any party receiving evidence that is potentially privileged should promptly return such evidence to the producing party and, if disputed, returned evidence may be the subject of discovery conference and motion practice.

The Court’s Order should not serve to limit a party’s right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness, and/or segregate privileged and/or protected information before production.

1
2 DATED this 22nd day of June, 2018.

DATED this 22nd day of June, 2018.

3 CORR DOWNS PLLC

JACKSON LEWIS P.C.

4
5 *s/Jacob Downs*

Jacob M. Downs, WSBA #37982

6 Joseph P. Corr, WSBA #36584

7 Attorneys for Plaintiff

s/Barry Alan Johnsrud

Barry Alan Johnsrud, WSBA #21952

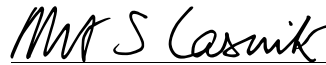
8 Sherry L. Talton, WSBA #42780

9 Attorneys for Defendant

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II. ORDER

PURSUANT TO THE ABOVE STIPULATION, IT IS SO ORDERED.

Dated this 27th day of June, 2018.



Robert S. Lasnik

United States District Judge

Presented by:

DATED this 22nd day of June, 2018.

DATED this 22nd day of June, 2018.

CORR DOWNS PLLC

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s/Barry Alan Johnsrud

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Attorneys for Defendant