

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

JOHN DYE,

Plaintiff,

v.

Case No. 11-CV-443

CHARLES J. GRISDALE PH.D., et al.,

Defendants.

STIPULATION FOR PROTECTIVE ORDER

Based on the court's order of April 6, 2012, John Dye, pro se, and the defendants, through their attorneys, stipulate to the following protective order:

1. Dye's medical and mental health records may not be used or disclosed by the parties or counsel for the parties or any persons identified below for any purposes whatsoever other than preparing for and conducting the litigation in which the information or documents were disclosed (including appeals).
2. Disclosure of Dye's medical and mental health records may be made only to the following:
 - a. Any person named as a defendant in this action.
 - b. Counsel for the defendants.
 - c. Employees of the Wisconsin Department of Justice or counsel for the parties who have direct functional responsibility for the preparation and trial of the lawsuit.Any such employee to whom counsel for the parties makes a disclosure must be

advised of, and become subject to, the provisions of this rule requiring that the documents and information be held in confidence.

- d. Employees of the Wisconsin Department of Corrections required in good faith to provide assistance in the conduct of the litigation in which the information was disclosed.
 - e. Court reporters engaged for depositions and those persons, if any, specifically engaged for the limited purpose of making photocopies of documents. Before disclosure to any such court reporter or person engaged in making photocopies of documents, such reporter or person must agree to be bound by the terms of this Rule.
 - f. Consultants, investigators, or experts (collectively "experts") employed by the parties or counsel for the parties to assist in the preparation and trial of the lawsuit. Before disclosure to any expert, the expert must be informed of and agree to be subject to the provisions of this rule requiring that the documents and information be held in confidence.
3. Upon conclusion of the litigation (including appeals, if any), all material described above must be destroyed.
 4. Nothing in this stipulated protective order should be interpreted to require any party to file relevant medical or mental health records under seal or prevent the introduction of such records at trial.
 5. The court may enter this order without further notice or hearing.

April 13, 2012
Date

John L. Dye Jr.
John Dye, pro se

Date

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