

AE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

EQUAL EMPLOYMENT OPPORTUNITY)	
COMMISSION)	
)	
Plaintiff,)	05C 0841
)	
v.)	
)	Judge Coar
)	
GATEWAY TO LEARNING, INC.,)	Magistrate Judge Schenkier
)	
Defendant.)	
)	

**PROTECTIVE ORDER
GOVERNING CONFIDENTIALITY OF
CERTAIN INFORMATION IN REGARD TO NANCY LOVE**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, and the stipulation of the parties, it is hereby agreed as follows:

1) The term "Confidential Information" is defined as information in the income tax returns of Nancy Love and ~~information as to her employment after February 1, 2005.~~ ^{PHC}

2) As used herein "disclose" shall mean to divulge, reveal, describe, summarize, paraphrase, quote, transmit, or otherwise communicate Confidential Information.

3) Confidential Information protected by this Order shall not be disclosed in any manner, directly or indirectly, to any persons except as follows:

a. Confidential information shall not be disclosed to any employee,

1 Neither Nancy Love nor the EEOC seek back-pay on her behalf after February 1, 2005. Nancy Love has been employed by the same employer since February 2, 2005.

manager, or Director of Gateway to Learning, or agent thereof, other than counsel of record in this case. Confidential Information may be used by and disclosed to the attorneys of record for Defendant and by clerks, paralegals, secretaries and other support staff who are assigned to work on this case and who are employed by such attorneys

- b. If Defendant seeks to file any confidential information with the Court, it must first petition the Court for an order providing that such information must be filed under seal. Defendant shall not file such confidential information with the Court for fourteen (14) days after providing EEOC with written notice of its intent to so file such information. If, during the fourteen (14) day period, EEOC petitions the Court for an order that such information must be filed under seal, Defendant will not file such information until the Court has ruled on the petition.

4) EEOC may redact from the income tax returns the social security numbers of spouses and children.

5) Confidential Information shall be used only for the purpose of this litigation.

6) This Order does not limit the right of any party to object to the scope of discovery in this case.

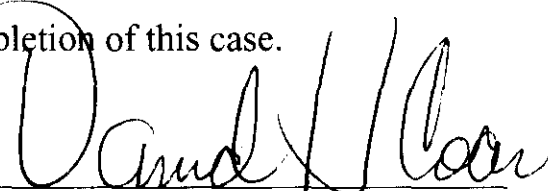
7) This Order does not constitute a determination of the admissibility or evidentiary foundation for any documents or a waiver of any party's objections thereto.

8) If and to the extent Defendant wishes to disclose any Confidential Information beyond the terms of paragraph 3 of this Order, it shall provide EEOC with reasonable notice in writing of its request to so disclose the information. If the parties cannot resolve their disagreement with respect to the disclosure of any Confidential Information, then a party may petition the Court to decide these

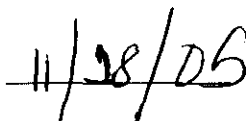
issues.

9) Within sixty (60) days of completion of the litigation (including any appeals) Defendant shall return to EEOC or destroy all copies of Confidential Information. If the documents are destroyed, Defendant's counsel shall certify in writing that the destruction has taken place. The obligation to maintain the confidentiality shall continue after the completion of this case.

ENTERED: _____


Judge Coar

Date: _____



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