
IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

EQUAL EMPLOYMENT OPPORTUNITY)	
COMMISSION,)	
)	
Plaintiff,)	
)	Civil Action No 2:06-2624 JPM-gbc
v.)	
)	Judge McCalla
PARAMOUNT STAFFING, INC.,)	Magistrate Judge Cohn
)	
Defendant.)	JURY DEMAND
)	

ORDER GRANTING JOINT MOTION FOR PROTECTIVE ORDER

It appearing to the Court, by the signatures of counsel set forth below, that the parties agree to entry of the following Protective Order to prohibit the disclosure of non-public, confidential, personnel, proprietary and/or sensitive information, documents and testimony that may be produced in discovery or otherwise provided or made available to the parties in this matter, pursuant to the Court's authority under Fed. R. Civ. P. 26(c),

It is hereby ordered, adjudged, and decreed as follows:

I. CONFIDENTIAL INFORMATION

A. Definition of Confidential Information

1. "Confidential Information," as used in this Agreement and Order, means any and all social security numbers contained in documents produced in this litigation, whether produced electronically or in hard copy.

2. For purposes of this Agreement and Order, the term “document” means all written, recorded or graphic material, whether produced or created by a party or another person (including but not limited to extracts and summarizes prepared from or regarding Confidential Information), whether produced pursuant to Rule 34, subpoena, agreement or provided in the form of responses to Interrogatories or Requests for Admissions or deposition testimony.

3. The parties will comply with the Local Rules of Court and redact all Confidential Information from any affidavits, briefs, memoranda, exhibits, or other papers filed with the Court.

B. Qualified Persons with Access to Confidential Information

Confidential Information shall be used only for the litigation, preparation for trial, trial and/or settlement of this action and shall not be disclosed or transmitted, verbatim or in substance, to anyone except the following “qualified persons”:

1. The attorneys of record in this action and their associated attorneys, legal assistants, and staff members working on the action to the extent reasonably necessary to render professional services in the action;

2. The named parties to this litigation with a need-to-know;

3. Outside consultants and/or experts retained for the purpose of assisting counsel in the litigation;

4. Witnesses interviewed by a party’s representatives or counsel, or persons deposed in this lawsuit, with a need-to-know Confidential Information;

5. Stenographic reporters engaged for depositions or other proceedings necessary to the conduct of the action.

C. Restrictions on the Use and Disclosure of Confidential Information

1. Persons obtaining access to items designated as “Confidential” shall use the information solely for litigation, preparation for trial, trial, and/or settlement of this action.

2. Any document containing any Confidential Information shall have said information redacted out before it is filed in compliance with the Local Rules of Court.

3. Neither the parties nor their counsel of record shall discuss or disclose the contents of any Confidential Information with any other person, except between themselves for purposes of this action and as otherwise permitted in this Order.

4. The provisions of this Order shall survive and remain in full force and effect after the entry of final judgment, including any appellate proceedings in this case, whether by settlement or adjudication.

It is so ordered this 3rd day of September, 2008.

s/JON PHIPPS McCALLA
UNITED STATES DISTRICT JUDGE

AGREED:

/s/ Steven Dills (with permission Brenda Nelson)

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