

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

ERIN GARDNER	:	CIVIL ACTION NO. 3:12CV1168(CSH)
<i>Plaintiff</i>	:	
	:	
v.	:	
	:	
UNIVERSITY OF CONNECTICUT	:	
HEALTH CENTER	:	
<i>Defendant</i>	:	November 6, 2013

JOINT PROTECTIVE ORDER

1) The use of all disks provided by defense counsel to plaintiff's counsel, his staff or experts which show or depict any inmate and any part of the inside or outside of a Connecticut Correctional Institution ("disks") shall consist of and be limited to disclosure to:

- a) Counsel of record for the named plaintiff and defendants;
- b) The paralegal, clerical and secretarial staffs employed by counsel referenced in section a above;
- c) Experts, investigators, and consultants retained by counsel in connection with any litigation arising from this incident;
- d) This Court;
- e) Any court reporter present in his or her official capacity at any hearing, deposition or other proceeding in this action;
- f) The plaintiff while she is in the presence of her counsel, Attorney Thomas Bucci
- g) Witnesses at deposition and trial.

2) That any person to whom the disks are to be disclosed subject to the Protective Order shall be informed of the contents of the Protective Order prior to said disclosure and shall agree in writing, or by statement recorded in a written transcript of proceedings, to be bound by its terms.

3) Plaintiff, her attorneys, agents, employees, and/or experts are expressly prohibited from copying said disks without prior written approval of the Court and all copies of the disks shall be returned to defense counsel at the conclusion of the case;

- 4) Any party may seek a modification of the Protective Order based upon a showing of good cause that the modification is necessary to further this pending court proceeding only. In the event such a motion is made, the identity of any person to whom disclosure of information is sought shall be included within the motion, along with the reason or reasons that disclosure of protected information is necessary to advance this litigation. Such disclosure of identity may be made to the court in camera.
- 5) Nothing in this Protective Order waives any party's right to object to the admissibility of the disks at trial in this or any other proceeding.
- 6) Prior to filing said disks with the court and/or moving for their introduction into evidence, both parties will jointly request that the disks be filed under seal.

By Order of the Court this 18th day of November, 2013

BY: /s/Charles S. Haight, Jr.

Senior United States District Court Judge

PLAINTIFF,
ERIN GARDNER

By: /s/ Thomas W. Bucci

Thomas W. Bucci
WILLINGER, WILLINGER
& BUCCI, P.C.
855 Main Street
Bridgeport, CT 06604
Tel: (203) 366-3939
Fax: (203) 337-4588
Email: thomasbucci@earthlink.net
Federal Bar # ct07805

DEFENDANT,
UNIVERSITY OF CONNECTICUT
HEALTH CENTER

By: /s/ Carolyn Ennis

Carolyn Ennis
Assistant Attorney General
55 Elm Street, P. O. Box 120
Hartford, CT 06141-0120
Tel.: 860-808-5340
Fax: 860-808-5383
E-mail: Carolyn.Ennis@ct.gov
Federal Bar # ct28485

CERTIFICATION

I hereby certify that on November 6, 2013, a copy of the foregoing Proposed Joint Protective Order was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Carolyn Ennis (# ct28485)
Assistant Attorney General

4226842