

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

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ROBERT P. H. HANCOCK  
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WESTERN DISTRICT OF TENNESSEE

MEDTRONIC SOFAMOR DANEK, INC., )

Plaintiff )

v. )

GARY KARLIN MICHELSON, M.D., and )  
KARLIN TECHNOLOGY, INC., )

Defendants. )

Civil Action No. 01-2373 GV

**STIPULATION AND  
TEMPORARY PROTECTIVE ORDER**

To facilitate Defendants' receipt of the unredacted *Response of Plaintiff Medtronic Sofamor Danek, Inc., to Defendant Gary K. Michelson, M.D.'s First Set of Interrogatories* IT IS HEREBY STIPULATED AND AGREED, by and between the parties to the above-identified action, through their respective counsel of record, subject to approval by the Court, as follows:

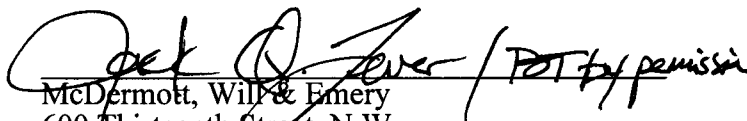
1. Until entry of a permanent protective order, all information contained in the unredacted *Response of Plaintiff Medtronic Sofamor Danek, Inc., to Defendant Gary K. Michelson, M.D.'s First Set of Interrogatories* shall be treated as "Confidential" and shall not be disclosed by Defendants to any person or entity other than Defendant Gary Karlin Michelson M.D. and his attorneys including necessary clerical and support personnel (for example, paralegals, data entry personnel, copy services, visual aid providers, or jury consultants) who are assisting such attorneys.
2. Until entry of a permanent protective order, none of the information contained in the unredacted *Response of Plaintiff Medtronic Sofamor Danek, Inc., to Defendant Gary K.*


*Michelson, M.D.'s First Set of Interrogatories* shall be used for any other purpose other than the above captioned litigation.

3. After entry of a permanent protective order, the information contained in the unredacted *Response of Plaintiff Medtronic Sofamor Danek, Inc., to Defendant Gary K. Michelson, M.D.'s First Set of Interrogatories* will be governed by the permanent protective order.

4. The entry of this Temporary Protective Order is agreed upon solely to facilitate Defendants' receipt and review of the unredacted *Response of Plaintiff Medtronic Sofamor Danek, Inc., to Defendant Gary K. Michelson, M.D.'s First Set of Interrogatories*, which counsel agree may be seen by Defendants and their counsel subject to the conditions set forth above. Thus, the agreement to this Temporary Protective Order shall be without prejudice to any party's position as to the contents of any permanent protective order to be entered by the Court, including without limitation the extent to which any other confidential discovery materials in this case may be viewed by the parties or their employees.

**COUNSEL FOR MEDTRONIC SOFAMOR DANEK, INC**

 / *PT by permission* Dated: Jan. 4, 2002  
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600 Thirteenth Street, N.W.  
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 Dated: Jan. 4, 2002  
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**COUNSEL FOR GARY KARLIN MICHELSON M.D. and  
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John O'Connell Dated: Jan. 2, 2002  
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IT IS SO ORDERED, with the consent of the parties, this 7<sup>th</sup> day of  
January, 2002.

Julia Smith Gibbons  
U.S. Dist. Judge Julia S. Gibbons



## Notice of Distribution

This notice confirms a copy of the document docketed as number 130 in case 2:01-CV-02373 was distributed by fax, mail, or direct printing on January 8, 2002 to the parties listed.

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Honorable Julia Gibbons  
US DISTRICT COURT