## IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT IN AND FOR PASCO COUNTY, STATE OF FLORIDA CIVIL DIVISION

MAUREEN A. LEOCE, and JOSEPH LEOCE, wife and husband,

Plaintiffs.

v.

Case No.: 14-CA-003990

MAIN STREET MEDICAL PLAZA, INC.,

SUBURBAN ELEVATOR OF FLORIDA, LLC, d/b/a INNOVATIVE ELEVATORS, and ORACLE ELEVATOR COMPANY,

Defendants.

AGREED CONFIDENTIALITY ORDER

It appearing to the Court that the Plaintiffs and Defendants are in agreement that Defendant, ORACLE ELEVATOR COMPANY, (hereinafter to be known and/or referred as ("ORACLE"), possesses proprietary policies and procedures, as well as personnel information that includes confidential information that may be subject to discovery in the proceedings in this matter but which should not be made available to the public generally. This court hereby orders that:

1. All documents produced or information disclosed and any other documents or records produced by ORACLE shall be revealed only to Plaintiffs and Co-Defendants, counsel of record in this case, paralegals and secretarial employees under counsels' direct supervision, and such persons as are employed by counsel to act as experts in these actions. The information considered as "confidential" and disclosed only in accord with the terms of this paragraph shall include, without limitation, all of ORACLE's policies and procedures, as well as personnel information supplied by ORACLE in response to Plaintiffs' or Co-Defendant's Interrogatories,

PASCO COUNTY, FLORIES

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2016 JUN 1 1 RM 2: 56

Paula S. O'Neil

Pasco County, Florida

Requests for Production or Requests for Copies.

- 2. Counsel for the Plaintiffs and Co-Defendants shall use all documents and information produced or disclosed by ORACLE solely for the purposes of preparation for and trial of this action. Under no circumstances shall information or materials covered by this Order be disclosed to anyone other than Plaintiffs' and Co-Defendant's counsel of record in this action, paralegals, secretarial employees under counsel's direct supervision, and such persons employed to act as experts in these actions. At the conclusion of the proceedings in these actions, all documents and information subject to this Order, including any copies or extracts or summaries thereof, or documents containing information taken therefrom, shall be returned to counsel for ORACLE.
- 3. Prior to disclosure of any documents to paralegals or secretarial employees of counsel or Plaintiff and Co-Defendant, counsel for the Plaintiff and Co-Defendant shall require such employees to read this Order and agree to be bound by its terms.
- 4. If counsel for the Plaintiff and Co-Defendant determines that for purposes of this action, documents or information produced by ORACLE must be revealed to a person employed to act as an expert in this action, then counsel may reveal the designated documents or information to such person, after first complying with the following:
  - (a) Counsel for the Plaintiff and Co-Defendant shall have the expert read this Order and shall explain the contents thereof to such expert.
  - (b) Counsel for the Plaintiff and Co-Defendant shall require such expert to sign a copy of this Order that states: "I have read and understood the terms of this Order.

    I further agree to be bound by its terms." Nothing in this paragraph shall be deemed to enlarge the right of Defendants to conduct discovery of any of

Plaintiff's experts, except solely with respect to the ability of such expert to protect confidential information and documents from re-disclosure.

- 5. Any pleading or other document disclosing information subject to this Order, which may be submitted to the Court, whether in the form of interrogatory answers, document production, deposition notices or transcripts, motions, affidavits, briefs or other documents, shall be filed in a sealed envelope appropriately marked as confidential and subject to this order. The Clerks are directed to maintain such documents under seal, to be made available only to the Court and to counsel in this proceeding.
- 6. This Order is subject to revocation and modification by Order of the Court upon written stipulation of the parties, or upon motion and reasonable notice, including opportunity for hearing and presentation of evidence.
- 7. This Order may be executed in counterparts, each of which shall be deemed to be an original, but all of which, taken together, shall constitute one and the same agreement.

Entered this 10 day of

, 2015.

HONORABLE CIRCUIT COURT JUDGE

APPROVED FOR ENTRY:

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