

**UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES**

In the Matter of)

CALIFORNIA PACIFIC MEDICAL GROUP, INC., d/b/a)
BROWN AND TOLAND MEDICAL GROUP,)
Respondent.)

Docket No. 9306

**STIPULATION BY THE PARTIES AND ORDER AMENDING THE PROTECTIVE
ORDER FOR PURPOSES OF THIRD PARTY DISCOVERY ISSUED TO HILL
PHYSICIANS MEDICAL GROUP**

IT IS HEREBY STIPULATED AND AGREED, by and between Respondent, Brown & Toland Medical Group (“Brown & Toland”), and third party subpoena recipient, Hill Physicians Medical Group, Inc. (“Hill Physicians”), that the Protective Order Governing Discovery Material (the “Protective Order”), entered on August 21, 2003 in this matter, and the Amended Protective Order Governing Discovery Material (the “Amended Protective Order”), entered on October 24, 2003 in this matter, shall be amended for purposes of all production or productions of documents, discovery material and information in this matter by Hill Physicians as follows:

For purposes of all production or productions of documents, discovery material and information in this matter by Hill Physicians, documents produced by Hill Physicians with the designation “Restricted Confidential, Outside Counsel Only – FTC Docket No. 9306” or the designation “Confidential - FTC Docket No. 9306” shall not, directly or indirectly, by vendors or by any other entities, be disclosed or otherwise provided to In-House Counsel for Brown & Toland including, but not limited to: Janet Shestakov, Esq.; Laurence Kessenick, Esq.; Hanson, Bridgett, Marcus, Vlahos, and Rudy, L.L.P.; associated attorneys of Hanson, Bridgett, Marcus, Vlahos, and Rudy, L.L.P., Laurence Kessenick, or Janet Shestakov; persons regularly employed

by Hanson, Bridgett, Marcus, Vlahos, and Rudy, L.L.P., Laurence Kessenick, or Janet Shestakov (including legal assistants, clerical staff, and information management personnel); vendors retained by Hanson, Bridgett, Marcus, Vlahos, and Rudy, L.L.P., Laurence Kessenick, or Janet Shestakov to provide copying, graphic, and other similar litigation support services; or temporary personnel retained by Hanson, Bridgett, Marcus, Vlahos, and Rudy, L.L.P., Laurence Kessenick, or Janet Shestakov to perform legal or clerical duties or to provide logistical litigation support.

Dated: _____

Richard A. Feinstein
Paul Kunz
BOIES, SCHILLER & FLEXNER, L.L.P.
Attorneys for Respondent, Brown & Toland Medical
Group

Dated: _____

Paul A. Stewart
FOLEY & LARDNER
Attorneys for Hill Physicians Medical Group

ORDER

BASED ON THE FORGOING STIPULATION BY THE PARTIES, IT IS ORDERED

THAT:

For purposes of all production or productions of documents, discovery material and information in this matter by Hill Physicians, documents produced by Hill Physicians with the designation “Restricted Confidential, Outside Counsel Only – FTC Docket No. 9306” or the designation “Confidential - FTC Docket No. 9306” shall not, directly or indirectly, by vendors or by any other entities, be disclosed or otherwise provided to In-House Counsel for Brown & Toland including, but not limited to: Janet Shestakov, Esq.; Laurence Kessenick, Esq.; Hanson, Bridgett, Marcus, Vlahos, and Rudy, L.L.P.; associated attorneys of Hanson, Bridgett, Marcus, Vlahos, and Rudy, L.L.P., Laurence Kessenick, or Janet Shestakov; persons regularly employed by Hanson, Bridgett, Marcus, Vlahos, and Rudy, L.L.P., Laurence Kessenick, or Janet Shestakov (including legal assistants, clerical staff, and information management personnel); vendors retained by Hanson, Bridgett, Marcus, Vlahos, and Rudy, L.L.P., Laurence Kessenick, or Janet Shestakov to provide copying, graphic, and other similar litigation support services; or temporary personnel retained by Hanson, Bridgett, Marcus, Vlahos, and Rudy, L.L.P., Laurence Kessenick, or Janet Shestakov to perform legal or clerical duties or to provide logistical litigation support.

IT IS SO ORDERED.

Dated: _____

ADMINISTRATIVE LAW JUDGE