

HEADING

AGREED PROTECTIVE ORDER

Now comes the plaintiffs, Paul Cassell and Bradley Edwards, and the defendant, Alan Dershowitz, each of whom moves that this Honorable Court enter a Protective Order that shall provide that discovery documents, including transcripts, tapes, and videotapes of depositions of both parties and witnesses, will not be filed in the public record without further order of the Court, will not be disclosed to third parties to this litigation (except experts who agree to be bound by the terms of this confidentiality order), shall not be published or disseminated to any third parties, and shall not be utilized in any other proceeding other than the current litigation. Any judicial pleading that appends a transcript or tape or videotape of any deposition, or quotes from any deposition, shall be filed with the discovery portion redacted subject to further Order of the Court. Further, to the extent any discovery as defined above has already been disclosed to third parties, it is the obligation of the party who made such disclosure to inform the third party of the terms of this Protective Order, see eg *Seattle Times Co v Rhinehart* 467 US 20, 31 (1984), *Chicago Tribune Co v Bridgestone/Firestone Inc* 2634 F3d 1304, 1316 (11th Cir, 2001).