

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS**

MARIA ALEJANDRA CELIMEN SAVINO,  
*et al.*,

Petitioners-Plaintiffs,

v.

STEVEN SOUZA

Respondent-Defendant.

Case No. 1:20-cv-10617-WGY

**STIPULATED PROTECTIVE ORDER**  
**REGARDING CONFIDENTIAL INFORMATION**

With the agreement of the Parties, the Court having determined that there is good cause for issuance of a protective order to govern the disclosure, use, and handling by the Parties and their respective agents, successors, personal representatives and assignees of certain information in the above-captioned action, IT IS HEREBY ORDERED as follows:

1. Private medical information produced by either Party during informal discovery or otherwise made available for the litigation will not be disseminated beyond the Counsel (including outside counsel) for the Parties, as defined to include associated personnel necessary to assist counsel in this Action, such as law student interns working under the supervision of counsel of record in this matter, litigation assistants, paralegals, and litigation support, information technology, information or records management, investigative, secretarial, or clerical personnel.
2. Such private medical information may be disclosed to experts or consultants for the Parties, provided the attorney of record first informs the expert that such information to be disclosed is confidential and to be used solely for the purpose of this litigation and further that

these restrictions are imposed by a court order.

3. The Parties will redact all private medical information in any publicly-available filings submitted to the Court.

Dated: April 4, 2020

/s/ William G. Young  
WILLIAM J. YOUNG  
UNITED STATES DISTRICT JUDGE