## IN THE STATE COURT OF DEKALB COUNTY STATE OF GEORGIA

PATRICK C. DESMOND, MARY C.	§	
DESMOND, Individually, and MARY C. DESMOND, as Administratrix of the Estate	§	
of PATRICK W. DESMOND	§	
	§	
Plaintiffs,	§	
v.	§	Civil Action File No: 10A28641-2
	§	
	§	
NARCONON OF GEORGIA, INC., NARCONON INTERNATIONAL,	§	
DELGADO DEVELOPMENT, INC., SOVEREIGN PLACE, LLC, SOVEREIGN PLACE APARTMENT MANAGEMENT,	§	
	§	
INC., LISA CAROLINA ROBBINS, M.D.,	§	
and THE ROBBINS GROUP, INC.	§	
Defendants.	§	

#### **PROTECTIVE ORDER**

Upon review of the information contained in the STIPULATION AND CONFIDENTIALITY AGREEMENT dated February 17, 2011 completed and filed by the parties, the court orders that the terms set forth therein are hereby adopted by the Court as a protective order governing discovery in this case.

IT IS SO ORDERED, this 25 day of MARCH, 2011.	
What has	
Ste Wan A. Willer The Honorable Anthony Del Campo	
Milamie (L. Eyrl Grand and State Court of DeKalb County	
Milanie C. Eyre STATE COURT OF State Court of DeKalb County  C. Robert G. Tanner The Honorable Anthony Del Campo State Court of DeKalb County	en l
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Jeffrey R. Harris	3 3 3 3 4 4
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STATE COURT OF NEKALB COUNTY, GA.

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of PATRICK W. DESMOND	§	
	§	
Plaintiffs,	§	
v.	§	Civil Action File No: 10A28641-2
	§	CIVII ACTION FINE INC. 10/12/04/1 2
	§	
NARCONON OF GEORGIA, INC., NARCONON INTERNATIONAL,	§	ORIGINAL
DELGADO DEVELOPMENT, INC.,	§	
SOVEREIGN PLACE, LLC, SOVEREIGN	§	
PLACE APARTMENT MANAGEMENT, INC., LISA CAROLINA ROBBINS, M.D.,	§	
and THE ROBBINS GROUP, INC.	§	
Defendants.	§	

#### STIPULATION AND CONFIDENTIALITY AGREEMENT

Plaintiffs and Defendants, by and through their undersigned counsel, enter the following Stipulation and Confidentiality Agreement regarding confidential information or documents:

- 1. For purposes of this Stipulation and Agreement, "Confidential Information" includes the names and identities of employees, documents regarding the structure and operation of Narconon of Georgia, Inc. and Narconon International, and documents regarding students of Narconon of Georgia, Inc.
- 2. The Confidential Information shall be limited to use in the above-referenced lawsuit ("Litigation") by the parties and counsel for the parties, consultants, expert witnesses, deponents, potential witnesses, court personnel, judges and jurors.

- 3. All Confidential Information produced or provided during the course of the Litigation shall be used solely for the purposes of pretrial discovery, settlement and compromise negotiations, trial and any appeal of the Litigation, and for no other purpose whatsoever.
- 4. The parties agree that no copies of the Confidential Information shall be distributed to anyone other than those identified in Paragraph 2 above, without the written consent of the producing party, other than as set forth in this Agreement. Further, all receiving parties will return the Confidential Information (including all copies thereof) to the producing party or destroy the Confidential Information at the conclusion of the Litigation.
- 5. This Stipulation and Confidentiality Agreement is without prejudice of the right of any party to oppose the admissibility of any of the information produced on the grounds of lack of relevancy, privilege or other legal reason.

Respectfully submitted this 18th day of February, 2011.

[Signatures Appear on Next Page]

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NARCONON INTERNATIONAL,	§	
DELGADO DEVELOPMENT, INC., SOVEREIGN PLACE, LLC, SOVEREIGN PLACE APARTMENT MANAGEMENT, INC., LISA CAROLINA ROBBINS, M.D., and THE ROBBINS GROUP, INC.	§	
	§	
	§	
	§	
Defendants.	§	

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am counsel for Defendant Narconon of Georgia, Inc. and that I have this day served a true and correct copy of the foregoing *Stipulation and Confidentiality Agreement* upon counsel for all parties by United States Mail, addressed as follows:

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This 18th day of February 2011.

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