

Exhibit A

**Defendant's Proposed Qualified
Protective Order**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOEL Q. HACK, an individual, and
WREN BEAULIEU-HACK, an individual,

Plaintiffs,

v.

THE CHARTER TOWNSHIP OF MILFORD,
a Michigan municipal corporation, TOWNSHIP
OF MILFORD BOARD, a public body,
DONALD D. GREEN, in his personal capacity and
in his official capacity as Supervisor of Milford
Township, and TIMOTHY C. BRANDT, in his
personal capacity and in his official capacity as
Building and Zoning Administrator of Milford Township,

Defendants.

MICHELLE C. HARRELL (P48768)
R.J. CRONKHITE (P78374)
Maddin, Hauser, Roth & Heller, P.C.
Attorneys for Plaintiffs
28400 Northwestern Hwy, 2nd Floor
Southfield, MI 48034
(248) 351-7017
rcronkhite@maddinhauser.com

JAMES E. TAMM (P38154)
RICHARD V. STOKAN, JR. (P61997)
O'Connor, DeGrazia, Tamm &
O'Connor, P.C.
Attorneys for Defendants
40701 Woodward Avenue, Ste. 105
Bloomfield Hills, MI 48304
(248) 433-2000
jetamm@odtlegal.com
rvstokan@odtlegal.com

STIPULATED QUALIFIED PROTECTIVE ORDER

Upon Stipulation of the Parties, and the Court being otherwise fully advised
in the premises;

IT IS HEREBY ORDERED that Defendants are granted a Qualified Protective Order to meet with Plaintiffs JOEL Q. HACK and WREN BEAULIEU-HACK's health care providers as follows:

- (A) Defense counsel shall be permitted to hold private, *ex parte* meetings/discussions with Plaintiffs JOELQ. HACK and WREN BEAULIEU-HACK's treating physicians/medical providers related to this action and the contents of the discussions need not be disclosed by defense counsel.
- (B) Defendants are prohibited from using or disclosing plaintiffs' protected health information for any purpose other than this litigation.
- (C) Defendants are required to either return or destroy any documentary health protected information at the end of the litigation.
- (D) Defense counsel shall be required to give clear and explicit notice to Plaintiffs JOELQ. HACK and WREN BEAULIEU-HACK's treating physicians/medical providers, both as to the purpose of any such *ex parte* meetings/discussions and to the fact that the *ex parte* meetings and/or discussions are not required.
- (E) Defense counsel shall advise Plaintiffs JOELQ. HACK and WREN BEAULIEU-HACK's treating physicians/medical providers that they may have their own counsel present during any such meetings/discussions.
- (F) Defense counsel need not obtain Plaintiffs/Plaintiffs counsel's consent before defense counsel may interview Plaintiffs JOELQ. HACK and WREN BEAULIEU-HACK's treating physicians/medical providers *ex parte*.
- (G) Plaintiffs' counsel may not attend the *ex parte* meetings with Plaintiffs JOELQ. HACK and WREN BEAULIEU-HACK's treating physicians/medical providers.

- (H) Plaintiffs' counsel shall not attempt to discourage Plaintiffs JOELQ. HACK and WREN BEAULIEU-HACK's treating physicians/medical providers from participating in the *ex parte* meetings or otherwise interfere with the *ex parte* meetings.
- (I) Defense counsel's right to *ex parte* meetings and/or discussions shall end upon the dismissal of this action and/or upon entry of a final judgment.

CIRCUIT COURT JUDGE

AGREED TO BY:

/s/

R.J. CRONKHITE (P78374)
Attorney for Plaintiff
rcronkhite@maddinhauser.com

/s/

JAMES E. TAMM (P38154)
RICHARD V. STOKAN, JR. (P61997)
Attorneys for Defendants
jetamm@odtlegal.com
rvstokan@odtlegal.com