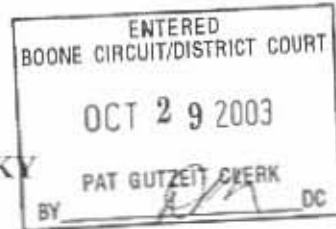


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COMMONWEALTH OF KENTUCKY
BOONE CIRCUIT COURT
CASE NO. 03-CI-00181

CARL COE (Pseudonym), et al.

PLAINTIFFS

vs.

HON. JOS. F. BAMBERGER

ROMAN CATHOLIC DIOCESE OF COVINGTON, et al.

DEFENDANTS

PROTECTIVE ORDER

Upon motion of Plaintiffs, and the Court in all respects being sufficiently advised, all documents produced by the Defendants in this matter shall be produced subject to the following protective order. The Court's earlier Agreed Orders of June 17 and 18, 2003, are hereby reconfirmed.

In order to protect the privacy of individuals named in the documents of the Roman Catholic Diocese of Covington, the Court ORDERS that all information in said documents, including names of priests, is considered CONFIDENTIAL and is for ATTORNEYS' EYES ONLY. Such documents shall be disclosed only to attorneys of the parties, to support personnel regularly employed in the attorneys' offices, and to expert consultants or witnesses, for use solely in this litigation.

Counsel for the class may disclose the above-described CONFIDENTIAL documents to the following expert consultants or expert witnesses: Mark Modlin and Dr. James Hawkins. Each expert consultant or witness who obtains CONFIDENTIAL documents shall sign the attached Certificate Regarding Confidentiality, and class counsel shall provide Defendants' counsel with a copy of the executed Certificate prior to any disclosure being made to the expert consultant or witness. In the event class counsel desire to disclose CONFIDENTIAL documents to additional experts, class counsel shall notify Defendants' counsel of such desire and provide

No copies, abstracts or summaries shall be made of the Confidential documents, except by or on behalf of said attorneys in said offices. Such copies, abstracts and summaries shall be deemed CONFIDENTIAL, and the designation shall be affixed thereto by the person making such copies, abstracts or summaries.

DATED THIS 27 DAY OCTOBER, 2003.


Honorable Joseph F. Bamberger
Boone Circuit Judge

CERTIFICATE
I, RAY GUTZENT, CL.
Clerk, County of ...
do hereby certify that ...
Boone District/Circuit
...
37 CC 300

AMC

CERTIFICATE REGARDING CONFIDENTIALITY

I hereby certify that I agree I will not use any CONFIDENTIAL documents shown or given to me in regard to *Coe vs. Roman Catholic Diocese of Covington*, Case No. 03-CI-00181, pending in the Boone Circuit Court, Commonwealth of Kentucky, for any purpose other than in consulting with Class Counsel. I have read the Court's Agreed Orders of June 17 and 18, 2003, and the Protective Order of October ___, 2003, and I agree to be bound by all such Orders of the Court, as well as by any subsequent Court Orders that may affect my involvement in this case. I agree I will not disclose any material or information contained in such CONFIDENTIAL documents to any person other than Class Counsel. I agree to return to Class Counsel all CONFIDENTIAL documents and any notes and/or memoranda that I make during the course of this lawsuit at the conclusion of the case.

Dated: _____