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BOONE CIRCUIT/DISTRICT COURT

OCT 2 9 2003

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

Defendants' counsel at least fourteen (14) days to object to class counsel to such additional disclosure. In the event Defendant's counsel object, class counsel may not disclose any CONFIDENTIAL documents to said additional expert without Court approval.

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.

No party represented by Class Counsel, including without limitation the named Plaintiffs, or any third parties not covered by this Protective Order, shall have access to the CONFIDENTIAL documents described herein. The names of all victims are to be redacted and a code name substituted for identification purposes. Class counsel shall not contact any priests identified in the documents produced without Court permission. In the event any CONFIDENTIAL information is filed with this Court in support of a motion or pleading, it is to be filed under seal.

DATED THIS 27 DAY OCTOBER, 2003.

Honorable Joseph F. Bamberger

Boone Circuit Judge

1. Part Curtzert. Ct. Boono District/Circuit

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.

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