

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO, EASTERN DIVISION**

OHIO A. PHILIP RANDOLPH INSTITUTE, <i>et al.</i>	:	
	:	
Plaintiffs,	:	Case No. 2:16-cv-00303
	:	
v.	:	JUDGE GEORGE C. SMITH
	:	
SECRETARY OF STATE, JON HUSTED	:	Magistrate Judge Deavers
	:	
Defendant.	:	

JOINT STIPULATION AND PROTECTIVE ORDER

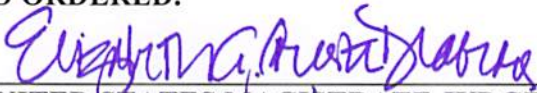
1. This Protective Order applies to documents and information produced in response to discovery requests served by Defendants upon Plaintiffs on or about May 8, 2016 (“Discovery Requests”).
2. Some of the documents and information requested include personal information of Plaintiffs’ members, clients, and constituents, including names, addresses, dates of birth, portions of social security numbers, Ohio drivers’ license numbers, state identification numbers, membership status in the Plaintiff organizations or their constituent member organizations, homeless status, and potentially other personal information. This information collectively shall be referred to herein as “Personal Information.”
3. Without permission of the Court, no Personal Information shall be shared with any person or entity other than the parties to this litigation, their lawyers, and any witness, non-party expert witnesses or consultants engaged by counsel of record to a party to

assist such counsel in the prosecution or defense of this action, each of whom shall be bound by this Order.

4. The documents and information produced in response to the Discovery Requests shall only be used for purposes of this litigation.
5. Within 60 days following conclusion of this litigation and all appeals, Defendant shall destroy all documents and discovery responses containing Personal Information.
6. Personal Information shall not be quoted in any public filings. Instead, the Parties are to use separate anonymous identifiers such as "Person A" and to separately and confidentially disclose to the opposing party's counsel the identity of Person A, so that the opposing party can effectively respond, as needed, to the allegation related to that individual.
7. To the extent it is necessary to file with the court a document containing any Personal Information or to include any Personal Information in any pleading in this litigation, any such document or pleading shall be filed under seal or otherwise have all of the Personal Information redacted.

Dated this 13th day of May, 2016

SO ORDERED.

A handwritten signature in purple ink, appearing to read "Elizabeth G. Austin", is written over a horizontal line.

UNITED STATES MAGISTRATE JUDGE