

IN THE MATTER OF
THE MARRIAGE OF

IN THE DISTRICT COURT OF

COLLIN COUNTY, TEXAS

AND

219TH JUDICIAL DISTRICT

PROTECTIVE ORDER
Medical and Psychiatric Records

1. On the this day came on to be considered by the Court the request for protection from disclosure of certain documents and records which have been inspected by the Court in camera, and shall hereinafter be referred to as Court's Exhibit "A-Medical and Psychiatric Records of " and held by the Court Reporter, and hereinafter referred to as "confidential documents".

2. The Court orders the said "confidential documents" to be discoverable and orders them to be disclosed pursuant to the following terms and provisions.

3. The said "confidential documents" shall not be used or shown, disseminated, copied or in any way communicated to anyone for any purpose whatsoever who is not a "Qualified Person" as defined in this order without the written permission of Respondent or by further order of this Court.

4. Except with prior written consent of Respondent or upon further order of this Court, said "confidential documents" shall be shown, or the contents thereof disclosed, only to the following persons (herein referred to as "Qualified Persons") by the parties or by their representatives:

- (a) the parties' counsel of record in this action;
- (b) employees of such counsel assigned to and necessary to assist such counsel in the preparation or the trial of this action;

(c) independent experts and consultants retained by the parties whose assistance is necessary for the preparation or trial of this specific action;

(d) the Court; and

(e) the Guardian Ad Litem, if one is appointed.

5. Each Qualified Person, as described in (a) through (e) above to whom the parties or their representatives intend to deliver, exhibit, or disclose any such "confidential document" or material contained therein shall be advised of the terms of this Order, shall be given a copy of this Order, and prior to any disclosure, shall agree in writing before a notary in the form attached hereto as Exhibit "1" to be bound by the terms as if they were parties' counsel. The agreements shall be filed with the Court, together with a copy to the Court Reporter.

6. The Court Reporter, or any other such agent or clerk of the Court in whose charge the "confidential documents" are entrusted for safekeeping, shall maintain a list of all persons to whom such agent, reporter, or clerk provides any such document or material contained therein, and that list shall be available for inspection by counsel for the parties and by the Court.

7. All "confidential documents" provided to any Qualified Person as provided herein shall be returned to the Court as soon as such Qualified Person has reviewed or otherwise evaluated the "confidential documents" so provided, but in no event shall such "confidential documents" remain out of the Court's custody for two weeks after a final decree has been signed by the Court.

8. No copies shall be made of the "confidential documents" or material contained therein, deposited with the Court except as provided in paragraph 5 without the prior written approval of the Respondent or further order of this Court.

9. To the extent that such "confidential documents" or information obtained therefrom is used in the taking of depositions, such "confidential documents" or information and the transcript pages of the deposition testimony dealing with the protected "confidential documents" or information shall remain subject to the provisions of this Order.

10. Promptly after the conclusion of this action, all "confidential documents", all copies of "Confidential Documents", and all excerpts therefrom shall be returned to counsel for Respondent.

11. The parties or "Qualified Persons" shall not under any circumstances publicize or disseminate in any manner either the contents of the "Confidential Documents" or the fact that the parties have obtained "Confidential Documents" from the Respondent.

12. After termination of this litigation, the provisions of this Order shall continue to be binding, except with respect to those "confidential documents" and information that become a matter of public record. The parties hereto and persons agreeing to be bound by this Order agree this Court retains and the Court thus orders that it shall have jurisdiction over the parties and recipients of the "Confidential Documents" for purposes of any necessary enforcement of the provisions of this Order following termination of this litigation.

13. This Order shall be binding upon the parties hereto, upon their attorneys, and upon the parties and their attorneys' successors, executors, personal representatives, administrators, heirs, legal representatives, assigns, subsidiaries, division, employees, agents, independent contractors, or other persons or organizations over which they have control.

SIGNED this _____ day of _____, 19_____.

Curt B. Henderson
Judge Presiding

EXHIBIT "1"
No. 219-

IN THE MATTER OF THE
MARRIAGE OF

AND

AND MINOR CHILDREN

IN THE DISTRICT COURT OF

COLLIN COUNTY, TEXAS

219TH JUDICIAL DISTRICT

I, _____ have read the Protective Order-Medical and Psychiatric Records in Cause No. 219-_____ and agree to be bound by the terms set forth therein.

STATE OF TEXAS

COUNTY OF COLLIN

SWORN TO AND SUBSCRIBED TO before me on this the ____ day of _____, 1992, to which certify my hand and seal of office.

Notary Public in and for
State of Texas

My commission expires: