

JAMES J. DONELON, COMMISSIONER	:	SUIT NO.: 651,069 SECTION: 22
OF INSURANCE FOR THE STATE OF	:	
LOUISIANA, IN HIS CAPACITY AS	:	
REHABILITATOR OF LOUISIANA	:	
HEALTH COOPERATIVE, INC.	:	
versus	:	19TH JUDICIAL DISTRICT COURT
TERRY S. SHILLING, GEORGE G.	:	
CROMER, WARNER L. THOMAS, IV,	:	
WILLIAM A. OLIVER, CHARLES D.	:	
CALVI, PATRICK C. POWERS, CGI	:	PARISH OF EAST BATON ROUGE
TECHNOLOGIES AND SOLUTIONS,	:	
INC., GROUP RESOURCES	:	
INCORPORATED, BEAM PARTNERS,	:	
LLC, MILLIMAN, INC., BUCK	:	
CONSULTANTS, LLC. AND	:	
TRAVELERS CASUALTY AND	:	STATE OF LOUISIANA
SURETY COMPANY OF AMERICA	:	

AMENDED PROTECTIVE ORDER

Before the Court is the Joint Motion to Enter Amended Protective Order herein, as respectfully and jointly requested by plaintiff and Buck Global, LLC (f/k/a Buck Consultants, LLC) and Milliman, Inc. Having considered the motion, the Court concludes that it should be, and is hereby, **GRANTED**.

Accordingly, it is **ORDERED** that the **PROTECTIVE ORDER** previously entered herein on December 13, 2017, shall be and hereby is amended to include the following, additional section:

25. "Highly Confidential Information" means any information or material which Defendants Milliman, Inc. or Buck Global, LLC (f/k/a Buck Consultants, LLC) considers in good faith to contain extremely sensitive trade secrets or other confidential research, development, or commercial information and that Defendants Milliman, Inc. or Buck Global, LLC (f/k/a Buck Consultants, LLC) believes will cause significant harm if disclosed.

a. Defendants Milliman, Inc. or Buck Global, LLC (f/k/a Buck Consultants, LLC) may designate any document or other material as Highly Confidential Information by stamping any page (or analogous portion) of any document or other material, including electronically stored information or any tangible thing, with the following legend, or a substantially similar legend:

HIGHLY CONFIDENTIAL INFORMATION

b. With respect to any document or other material designated as Highly Confidential Information, the term "Qualified Person" as defined in Section 3 of the Protective Order entered in This Action on December 13, 2017 (the "Order") shall be modified as follows:

1. With respect to any document or other material designated as Highly Confidential Information by Milliman, Inc. such Highly Confidential Information will be disclosed only to Counsel for Buck Global, LLC (f/k/a Buck Consultants, LLC) on an "attorney's eyes only" basis but shall not otherwise be disclosed, orally or in writing, to Buck Global, LLC (f/k/a Buck Consultants, LLC), including at any deposition. For avoidance of any doubt, the term "Counsel" as defined in the Order does not include in-house counsel and Highly Confidential Information designated by Milliman, Inc. will not be disclosed to in-house counsel for Buck Global, LLC (f/k/a Buck Consultants, LLC).

2. With respect to any document or other material designated as Highly Confidential Information by Buck Global, LLC (f/k/a Buck Consultants, LLC), such Highly Confidential Information will be disclosed only to Counsel for Milliman, Inc. on an "attorney's eyes only" basis but shall not otherwise be disclosed, orally or in writing, to Milliman, Inc., including at any deposition. For avoidance of any doubt, the term "Counsel" as defined in the Order does not include in-house counsel and Highly Confidential Information designated by Buck Global, LLC (f/k/a Buck Consultants, LLC) will not be disclosed to in-house counsel for Milliman, Inc.

3. Subject to the limitations in Sections 25 (b)(1) and b(2) above, no party may allow any witness to copy or in any way reproduce any Highly Confidential Information.

c. To the extent the Party who designated a document or other material as Highly Confidential Information wishes to use that Highly Confidential Information at a deposition where the deponent is not a Qualified Person under Section 25(b), the designating Party must notify all Parties that it is removing the Highly Confidential Information designation from the document or other material at issue no later than 5 business days before the deposition.

d. Subject to the modifications in this Section 25, all other provisions of the Order and the Consent shall apply equally to documents or other materials designated, or to be designated, as Highly Confidential Information as they do to documents or other materials designated, or to be designated, as Confidential Information. All capitalized terms not defined herein shall have the same meaning as set forth in the Order.

e. For purposes of the Consent, the term Protective Order as used therein shall mean the Order as modified by this Section 25.

SO ORDERED this _____ day of June 09 2020, 2020, at Baton Rouge, Louisiana.



HON. JUDGE TIMOTHY KELLEY, 19th JDC

CERTIFICATE OF SERVICE

I herby certify that a true copy of the foregoing has been furnished via e-mail and U.S.

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Baton Rouge, Louisiana this 5th day of June, 2020.



J. E. Cullens, Jr.

I HEREBY CERTIFY THAT ON THIS DAY A COPY OF
THE WRITTEN REASONS FOR JUDGMENT /
JUDGMENT / ORDER / COMMISSIONER'S
RECOMMENDATION WAS MAILED BY ME WITH
SUFFICIENT POSTAGE AFFIXED.
SEE ATTACHED LETTER FOR LIST OF RECIPIENTS.

DONE AND MAILED ON June 11, 2020



DEPUTY CLERK OF COURT