

11.4 SAMPLE PROPOSED ORDER

SUPERIOR COURT OF MAJOR,
JAMNER COUNTY

GLENNA WASHINGTON,))	
)	
Plaintiff,))	No. 7-43-20XX
v.))	PROTECTIVE ORDER
)	
MARC PROUST,))	
)	
Defendant.))	
_____))	

Defendant Marc Proust applied for a Protective Order in the matter of *Washington v. Proust*. This Court considered the motion, affidavit of Dr. Johnson, Declaration of B.Y. Davis, the Memorandum of Law submitted by plaintiff and defendant, and the arguments of counsel. It is ordered:

Plaintiff Washington is prohibited from discovering the psychological treatment records of the defendant Marc Proust.

Nothing in this Order shall preclude any party from applying to the court for additional or different protective provisions in respect to specific documents if the need arises during this litigation.

DATED: March 16, 20XX.

Judge

Presented by:

 B.Y. Davis
 Attorney for Defendant Marc Proust
 16 Stratton Road
 Ruston, Major 96120
 Tel.: (206) 241-0280
 Bar No.: 8267

Approved as to Form,
Notice of Presentation Waived:

F.C. Townsend Attorney for Plaintiff
1600 Nat'l Bank Bldg.
Ruston, Major 96120
Tel.: (206) 825-6245
Bar No.: 1341
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B.Y. Davis _____