



been previously deposed in Fairholme, but plaintiffs' counsel may receive electronic copies of those deposition transcripts.

- Plaintiffs' counsel may seek to depose witnesses who are not noticed by counsel for Fairholme, subject to the right of defendant or of the witness to object to any such deposition.
- If a dispute arises concerning the scope of the court's jurisdictional discovery order in Fairholme, plaintiffs' counsel may participate in motions practice, including by challenging the assertion of privilege or the resistance to discovery by defendant, and/or by submitting responses to any motions filed by defendant.

**Washington Federal, 13-385C:**

- Documents produced under jurisdictional discovery in Fairholme that are subject to the protective order in that case may be used in Washington Federal in accordance with the restrictions of the protective order.
- Documents produced during jurisdictional discovery in Fairholme that counsel for Washington Federal seek shall only be provided in electronic form.
- Plaintiffs' counsel in Washington Federal may attend the depositions in Fairholme, but may not participate. Plaintiffs' counsel may not depose witnesses who have already been deposed in Fairholme, but plaintiffs' counsel may receive electronic copies of those deposition transcripts.

**Reid, 14-152C, and Fisher, 13-608C:**

- Documents produced under jurisdictional discovery in Fairholme that are subject to the protective order in that case may be used in Reid and Fisher in accordance with the restrictions of the protective order.
- Documents produced during jurisdictional discovery in Fairholme that counsel for Reid and Fisher seek shall only be provided in electronic form.
- Plaintiffs' counsel in Reid and Fisher may attend the depositions in Fairholme, but may not participate. Plaintiffs' counsel may not depose witnesses who have already been deposed in Fairholme, but plaintiffs' counsel may receive electronic copies of those deposition transcripts.

Finally, the counsel for the parties in Fairholme, Cacciapalle, Washington Federal, Reid, and Fisher shall confer to determine what changes are necessary to the current protective order. The changes to the protective order must be agreeable to all parties. Then, as soon as practicable, but **by no later than Wednesday, July 22, 2015**, counsel for Fairholme shall file a proposed form of Amended Protective Order in its case which shall be accompanied by a copy of the original protective order that clearly indicates all changes thereto.

**IT IS SO ORDERED.**

s/ Margaret M. Sweeney  
MARGARET M. SWEENEY  
Judge