

Plaintiffs' Counsel will be permitted to disclose: (i) aggregate trend information gleaned from the reports of the preliminary reviews, excluding reference to any specific incidents or individuals, and with the express caveat that any information disclosed is based on preliminary assessments, as set forth in the Court's Order dated September 13, 2016 (Dkt. 289), and (ii) information that is included in a Monitor's Report filed with the Court; and

(l) All other documents that all Parties agree shall be treated as Confidential Materials, provided notice is given to the Court;

IT IS FURTHER STIPULATED AND AGREED, that nothing in this stipulation and order shall be deemed as a waiver by the City or DOC of any applicable privilege whatsoever.

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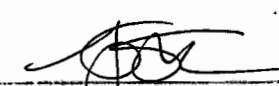
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SO ORDERED this 30th day of March, 2017


LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE