STATE OF MICHIGAN
COURT OF CLAIMS

JAMI VAUGHN, as Next Friend of P.V., a minor,

Plaintiff,

v

MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES,

Defendant.

Case No. 24-000040-MM

HON. CHRISTOPHER P. YATES

STIPULATED PROTECTIVE ORDER

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STIPULATED PROTECTIVE ORDER

At a session of said Court, held in the State of Michigan,
on the 15th day of February 2026.

PRESENT: HON. CHRISTOPHER P. YATES
Court of Claims Judge

The following Protective Order shall govern the exchange of confidential information from the Defendant, Michigan Department of Health and Human Services (MDHHS) pursuant to the Plaintiff's Interrogatories and Request for Production of Documents Directed to Defendant Michigan Department of Health and Human Services to Release, Produce, or Allow Inspection of Certain Information:

THE PLAINTIFF AND MDHHS AGREE TO THE FOLLOWING DEFINITIONS:

(a) "Action" means *Jami Vaughn, as Next Friend of P.V., a minor v State of Michigan, Department of Health and Human Services*, Michigan Court of Claims No, 24-000040-MM.

(b) "Confidential Documents", "Confidential Materials", or "Confidential Information" shall include, but not be limited to all written, recorded, electronic, or digital items produced by MDHHS in this Action. It includes personally identifiable information ("PII").

1. Plaintiff's Interrogatories and Request for Production of Documents Directed to Defendant Michigan Department of Health and Human Services were served upon the Defendant on January 14, 2026.

2. The Court finds the information necessary to determine an issue before the Court. MCL 722.627(1)(g).

3. All confidential information produced by MDHHS shall be used solely for the purposes of this Action, or any subsequent appellate proceedings related to

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this Action, and shall not be disseminated or published outside of this Action or any subsequent appellate proceedings.

4. Any such documents and materials and information may be used only for purposes of this Action and potential appellate proceeding, and may be disclosed or communicated only to:

a. Counsel for the Plaintiff and each of their respective employees (hereinafter "counsel").

b. Court personnel and certified shorthand reporters and their employees.

c. Any investigator or expert hired by the parties and/or their counsel provided that each individual to whom confidential information has been, are being, or will be disclosed are informed of the provisions and restrictions of this Protective Order are bound to the same.

d. Any other person upon order of the Court.

5. The parties agree that any confidential information submitted or filed with the Court shall be filed pursuant to MCR 1.109(D)(9) and shall not be open to the public without redactions.

6. Subject to the Michigan Rules of Evidence, documents and material which have been produced in this action may be offered in evidence at hearing despite their confidential nature. Nothing in this Protective Order shall prevent or otherwise restrict any party from objecting before or during the hearing to the admissibility of any documents and material that is confidential.

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7. This Protective Order shall be without prejudice to the right of any person to apply to the Court for such further protective orders under the provisions of the Michigan Court Rules and statutory obligations as justice may require.

8. Each party reserves the right to seek a modification of this Protective Order if that party believes that the terms of the Protective Order have become inappropriate to this Action.

9. Within forty-five (45) days of the conclusion of this Action, which conclusion shall include the time for any appeal by any of the parties as to any of the matters raised by the Action, all confidential information produced by MDHHS, and all copies thereof, shall be collected by counsel and either destroyed or returned to MDHHS. Notwithstanding this agreement, counsel for the parties may retain a copy of confidential materials as part of counsels' case files per that counsels' file retention policy. Such materials will continue to be confidential under this Protective Order and shall be destroyed or returned at the end of the retention policy period.

IT IS SO ORDERED.

/for/

Hon. Christopher P. Yates
Court of Claims Judge

Stipulated and approved for entry:

Dated: 2/10/2026

J.R. Feild (P88320)
Attorney for Plaintiff

Dated: February 11, 2026

Kelly A. Carter (P56129)
Attorney for Defendant

Court of Claims

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