STATE OF MICHIGAN
IN THE COURT OF CLAIMS

BRAYSHAWN WHITE, #628763,

Plaintiff,

v

No. 26-000119-MP

MICHIGAN DEPARTMENT OF CORRECTIONS, AND S. SUN,

HON. SIMA G. PATEL

Defendants.

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STIPULATED PROTECTIVE ORDER

This matter having come before the Court on the parties' stipulation, and the Court being fully apprised in the premises;

IT IS HEREBY ORDERED as follows:

1. **Scope.** The last known address for former Michigan Department of Corrections' (MDOC) employee S. Sun who was employed in Food Service at the Richard A. Handlon Correctional Facility produced by the MDOC in response to the subpoena dated June 24, 2026, issued by Plaintiff's counsel shall be subject to this order concerning Attorney Eyes Only Information as defined below. This order is subject to the Local Rules of this Court and the Michigan Court Rules.

2. **Attorney Eyes Only Information**. When used in this order, "Attorney Eyes Only Information" means documents, other material, or information designated as "ATTORNEY EYES ONLY – SUBJECT TO PROTECTIVE ORDER" by the producing party or non-party that falls within the following categories: (a) documents, other material, or information whose disclosure presents a danger to the security interests of the Michigan Department of Corrections; (b) information that endangers public safety; or (c) information that reveals personal identifying information of an employee or former employee of the Michigan Department of Corrections (other than name).

3. All Attorney Eyes Only Information, as that term is defined by Paragraph 7, shall be used solely for the prosecution and/or defense of this action, including any appeal(s) resulting from this action.

4. Except as provided in Paragraphs 10 and 11, no document, materials, or information designated as Attorney Eyes Only Information may be disclosed to any person other than:

a. Counsel for the parties;

b. Secretaries, paralegals, assistants, and other employees of such counsel who are actively engaged in assisting counsel in the preparation of this action;

c. The Court and its personnel;

d. Any facilitator/mediator who the parties have agreed to use in this case or ordered by the Court; or

e. Any outside consultants and experts retained for the purpose of assisting in the in the preparation of this action (whether or not said outside consultant or expert is retained to testify in this action), subject to the provisions of Paragraphs 12 and 13.

5. Attorney Eyes Only Information may be disclosed to the following persons with notice to the party producing the Attorney Eyes Only Information:

a. Persons noticed for deposition, but only during the deposition, unless they are one of the individuals enumerated in preceding Section 9;

b. A court reporter who is making a record of a deposition if the information is referenced during the deposition.

6. Except for the counsel for the parties in this action, and their employees, secretaries, and paralegals covered by the provisions of Paragraph 9a and 9b, or the Court and its personnel covered by the provisions of Paragraph 9c, disclosure to other persons shall be made only upon the condition that the party disclosing the Attorney Eyes Only document or information shall inform the person that he or she: (a) shall not use, directly or indirectly, any information from any Attorney Eyes Only documents for purposes other than the prosecution or defense of this action; (b) shall not copy or duplicate, in any form, any Attorney Eyes Only documents or information from any Attorney Eyes Only documents; or (c) disclose such information to any person who is not permitted to receive such documents and information under the terms of this Protective Order.

7. Persons covered by the provisions of Paragraph 4e, Paragraph 9e, and Paragraph 10a should immediately turn over any Attorney Eyes Only Information to the producing party once their reason for the disclosure has been satisfied. If any information or contents of any Attorney Eyes Only Information are disclosed in a deposition or court proceeding, (1) either party may designate that a portion of the deposition transcript be designated as Attorney Eyes Only Information, and

(2) the court reporter may retain a copy of the Attorney Eyes Only Information along with any transcript(s) of the deposition subject to the provisions of Paragraph 11 Nothing in this paragraph shall prevent counsel for the parties from obtaining a copy of any transcripts of a sealed deposition.

8. Documents produced or information covered by this Protective Order shall be made available only to persons authorized by this Protective Order. Nothing in this Order shall prevent a party from using any Attorneys Eyes Only in any court filings, during a hearing, or at trial. If any party proposes to or intends to use such material, that party shall give reasonable notice, based on the circumstances, to the designating party of such intended use to allow the designating party an opportunity to petition the Court to institute appropriate procedures to maintain the confidentiality of the materials to be used as provided in the Michigan Court Rules. The party designating the document as Attorney Eyes Only pursuant to this order may waive the confidentiality designation at any time by providing written notice to the opposing party, or by express oral waiver of such designation during a deposition or other proceeding on the record.

9. Nothing in this order shall prevent any party or nonparty from seeking modification of this Protective Order, or from changing or objecting to discovery that it believes to be otherwise improper.

10. **Attorney Eyes Only Information Subpoenaed or Ordered to be Produced in Other Litigation.** If a receiving party is served with a subpoena or an order issued in other litigation that would compel disclosure of any material or document designated in this action as Attorney Eyes Only Information, the

receiving party must so notify the MDOC, in writing, immediately and in no event more than three business days after receiving the subpoena or order. Such notification must include a copy of the subpoena or court order. The receiving party also must immediately inform in writing the party who caused the subpoena or order to issue in the other litigation that some or all the material covered by the subpoena or order is the subject of this order. In addition, the receiving party must deliver a copy of this order promptly to the party in the other action that caused the subpoena to issue. The receiving party shall not produce the Attorney Eyes Only Information without order from this Court or from another court of competent jurisdiction.

IT IS SO ORDERED.

Dated: July 13, 2026

Hon. Sima G. Patel
Court of Claims Judge

The undersigned parties agree and stipulate to entry of the above Stipulated Protective Order.

Date: July 10, 2026

/s/Daniel Randazzo (w/consent)
Daniel Randazzo (P39935)
Attorney for Plaintiff

Date: July 10, 2026

/s/Kristin M. Southerland
Kristin M. Southerland (P64353)
Attorney for MDOC