

1. Disclosure to Counsel. Identifying information concerning the members of Mass General Brigham’s medical and religious exemption committees may be disclosed to counsel for

plaintiffs. Counsel shall not use or disclose that identifying information for any purpose other than litigation of this matter, and only as may be reasonably necessary to conduct this litigation.

2. Disclosure to Named Plaintiffs. Individual named plaintiffs may only receive identifying information concerning the members of the committee who reviewed their specific application, and only as directed in this order. Such identifying information may be provided to an individual plaintiff only orally or telephonically, and shall not be provided by other electronic media or in paper form. No individual plaintiff shall be permitted to discuss or otherwise reveal identifying information concerning such members to anyone other than counsel, for any reason, and by any means. In particular, and without limitation, plaintiffs may not disseminate identifying information of committee members orally, telephonically, in writing, on social media, by e-mail, or by any other electronic means.

3. Acknowledgement Form. Each plaintiff who seeks to learn identifying information concerning any member who voted to deny his or her exemption under the conditions of this order must first sign a copy of the attached acknowledgement form, Exhibit A, attesting that he or she will comply with the protective order and not disclose this information to anyone other than their counsel.

4. Other Employees. The identities of other Mass General Brigham employees who received either a medical or religious exemption, or both, if otherwise relevant and discoverable, may only be disclosed to counsel for plaintiffs. Such information should be designated as “for attorneys’ eyes only” and may not be disseminated or disclosed to any individual named plaintiff without a Court order.

5. Public Court Filings. The parties shall not disclose identifying information concerning the committee members or employees who received a COVID-19 vaccination

exemption in any public court filings, absent further Court order.

6. Exclusions. For purposes of this order, the identities of Dr. Dean Hashimoto, Ramona Nichols, and Dr. Michael Klompas shall be excluded, as they were previously identified by Mass General Brigham during this litigation.

7. Potential Sanctions. This order shall be effective immediately, and shall be enforceable, among other ways, through the contempt powers of the Court.

So Ordered.

Dated: December 22, 2021

/s/ F. Dennis Saylor IV
F. Dennis Saylor IV
Chief Judge, United States District Court

EXHIBIT A

ACKNOWLEDGEMENT

_____ declares that:

I reside at _____ in the city of _____, county
_____, state of _____.

I am a named individual plaintiff in the civil action titled *Together Employees et al. v. Mass General Brigham, Inc.*, Case No. 21-11686-FDS, pending in the United States District Court for the District of Massachusetts.

I was denied a COVID-19 vaccination exemption from Mass General Brigham's:
Medical Exemption Review Committee [___];
Religious Exemption Review Committee [___];
Or both committees [___].

I have read and understand the terms of the Protective Order dated December 22, 2021, entered in *Together Employees et al. v. Mass General Brigham, Inc.*

I agree to comply with and be bound by the provisions of the Protective Order. I agree that I may only review identifying information concerning the committee members who reviewed and denied my COVID-19 vaccination exemption request, in the format and under the conditions specified by the Protective Order. I agree not to discuss or otherwise reveal that identifying information to anyone other than counsel, for any reason, in any manner or method. In particular, and without limitation, I agree not to disseminate the identifying information orally, telephonically, in writing, on social media, by e-mail, or by any other electronic means.

I understand that any violation of the Protective Order may subject me to sanctions by the

Court, which could include fines or incarceration. I shall not copy or use the identifying information except for the purposes of this action and pursuant to the terms of the Protective Order.

I submit myself to the jurisdiction of the United States District Court for the District of Massachusetts for the purpose of enforcing or otherwise providing relief relating to the Protective Order, even if such enforcement proceedings occur after termination of this action. I hereby appoint my counsel, _____ of _____ as my Massachusetts agent for service of process in connection with this action or any proceedings related to enforcement of this Protective Order.

I declare under penalty of perjury that the foregoing is true and correct.

Date: _____

Signature: _____