

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ROBERTA LANCIONE, et al.,

Plaintiffs,

v.

MASS GENERAL BRIGHAM
INCORPORATED,

Defendant.

Civil Action No. 1:21-cv-11686

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Pursuant to Fed. R. Civ. P. 26(c), Roberta Lancione and the 222 other Plaintiffs (“Plaintiffs”) and Defendant Mass General Brigham Incorporated (“MGB” or “Defendant”), through their respective counsel, hereby jointly move the Court for an Order approving and entering the Stipulated Confidentiality Protective Order attached hereto as Exhibit 1. As grounds for this joint motion, the parties state as follows:

1. The parties agree that certain information that has been, or is anticipated to be, requested and exchanged in discovery in the above-captioned matter constitutes confidential and sensitive corporate information and/or personal information that must be subject to reasonable protections against disclosure outside the context of the litigation.
2. The parties have stipulated to the entry of the attached Stipulated Protective Order as an alternative to presenting to the Court any disputes regarding the production of such information. This Stipulated Protective Order is in addition to the Protective Order that this Court entered on December 22, 2021. *See* Dkt. 60.

WHEREFORE, Plaintiffs and Defendant respectfully request that the Court approve and enter the Stipulated Confidentiality Protective Order attached hereto as Exhibit 1.

Dated: February 22, 2022

Respectfully Submitted,

/s/ Ryan P. McLane

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CERTIFICATE OF SERVICE

I hereby certify that, on February 22, 2022, this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

/s/ Lynn A. Kappelman

Lynn A. Kappelman