

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Salvatore Ziccarelli, )  
                          )  
                          )  
                          )  
                          )  
Plaintiff              )  
                          )    No. 17-cv-3179  
-vs-                  )  
                          )    (Judge Tharp)  
Thomas J. Dart, etc., et al )  
                          )  
                          )  
                          )  
Defendants           )

**AGREED MOTION FOR ENTRY OF AGREED QUALIFIED  
HIPAA PROTECTIVE ORDER**

Plaintiff, with the agreement of defendants, respectfully requests the Court to enter an agreed HIPAA order in the form submitted to the Court's proposed order email box.

Grounds for this motion are as follows:

1. Defendants have requested plaintiff to produce medical records that may be relevant to this case.
2. Plaintiff does not have possession of the requested records; the most efficient way to obtain those records is by subpoena, supported by a HIPAA qualified protective order.
3. The parties agree that there is good cause for entry of the Order because the evidence in this case will include sensitive medical information covered by the Health Insurance Portability and Accountability Act of 1996.
4. Defendants agree to this motion and to the form of the HIPAA order.

Respectfully submitted,  
[signature on next page]

/s/ Kenneth N. Flaxman  
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