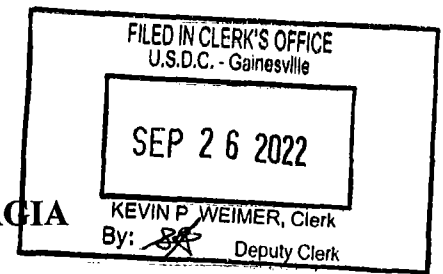


UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION



IN RE: ETHICON PHYSIOMESH FLEXIBLE COMPOSITE HERNIA MESH PRODUCTS LIABILITY LITIGATION	MDL DOCKET NO. 2782 CIVIL ACTION NO. 1:17-md-02782-RWS
THIS DOCUMENT RELATES TO ALL CASES	

QUALIFIED PROTECTIVE ORDER

Plaintiffs in MDL 2782 have asserted claims against defendants in the above-captioned action. These individuals have retained counsel to represent them in relation to the above-captioned action. This Court has appointed Blasingame, Burch, Garrard & Ashley, P.C., and Motley Rice, LLC (collectively as MDL Plaintiffs' Co-Lead Counsel) to represent the interests of all Plaintiffs in the Litigation.

IT IS HEREBY ORDERED AS FOLLOWS:


1. This Qualified Protective Order shall apply to all cases filed as a part of this MDL 2782 as of the date of the entry of this Order.
2. By virtue of their status as Co-Lead Counsel for the plaintiffs, Blasingame, Burch, Garrard & Ashley, P.C., and Motley Rice, LLC, shall facilitate the management of the docket for all plaintiffs in this litigation.

3. The entry of this HIPAA-compliant qualified protective order is necessary in this action in order to permit the Defendants to transmit information, including protected health information and other related information regarding the plaintiffs in this MDL 2782 to Plaintiffs' Co-Lead Counsel, rather than providing copies of individual HIPAA authorizations and information on a plaintiff-by-plaintiff basis.
4. As such, it is hereby ordered:
 - a. This Qualified Protective Order shall apply to all "protected health information" and "individually identifiable health information," as defined by 45 CFR § 160.103, or information that is otherwise protected from disclosure by the Privacy Act, 5 U.S.C. § 551a, the Health Insurance Portability and Accountability Act of 1996, Pub. L. 104-191, 42 CFR § 431 Subpart F, titled "Safeguarding Information on Applicants and Recipients" and other applicable state law, created, received or collected from plaintiffs and claimants by Defendants.
 - b. Defendants are hereby authorized to transmit to Plaintiffs' Co-Lead Counsel to facilitate the management of the docket for all plaintiffs in this MDL 2872, any information, including protected health information, for plaintiffs in this MDL 2782.
 - c. Plaintiffs' Co-Lead Counsel shall not use or disclose any protected

health information or individually identifiable health information subject to this Qualified Protective Order for any purpose other than this litigation, including compliance with any applicable Court orders or other legal obligations. If Plaintiffs' Co-Lead Counsel utilize outside vendors or companies, the outside vendors or companies shall be expressly bound by all terms and conditions of this Qualified Protective Order.

- d. Plaintiffs' Co-Lead Counsel shall maintain any protected health information or individually identifiable health information subject to this Qualified Protective Order in a secure and safe area and shall exercise the same standard of due and proper care with respect to the storage, custody, use and/or dissemination of such protected health information as is exercised by Plaintiffs' Co-Lead Counsel with respect to its own confidential proprietary information.

SO ORDERED, this 26th day of September, 2022.


RICHARD W. STORY
United States District Judge

Presented by:

By: /s/ Henry G. Garrard, III
Henry G. Garrard, III

hgarrard@bbga.com
Georgia Bar No. 286300

Blasingame, Burch, Garrard & Ashley, P.C.
P.O. Box 832
Athens, GA 30603
(706) 354-4000
(706) 549-3545 (fax)

By: /s/ Donald A. Migliori
Donald A. Migliori
dmigliori@motleyrice.com
South Carolina Bar No. 102549

Motley Rice LLC
28 Bridgeside Blvd.
Mt. Pleasant, SC 29464
(843) 216-9118