

Case file register: cited pages (SYNTHETIC)

Jane Doe, individually and as parent of Baby D., v. Example Medical Center, et al. Superior Court of Example County, No. EX-2025-CV-0417. Expert: A. Example, M.D. Register as of 2026-09-24. Prepared by David A. Black Litigation Support Services.

Received: 14 productions, 3,200 pages, produced by three parties and forwarded by retaining counsel, plus the stipulated protective order (a SYNTHETIC form) and two Exhibit A acknowledgments. The register (.xlsx) holds every row; this PDF bundles only the pages that the findings below point to. Each blue Bates label opens the bundled page, and each bundled page has a Back to index link.

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Findings in brief

- Bates overlap: items 9 and 10 both carry EMC000580 to EMC000610 (31 numbers). The pages under those numbers differ in content. Unique Bates numbers received: 3,169 of 3,200 pages.
- Referenced but not received: 4 documents are mentioned in received pages and are not in the received log, including the deposition of C. Placeholder, R.N., taken 2026-04-29, which three received pages mention.
- Rule 26(a)(2)(B) presence check on the report as served 2026-06-30: 5 of 6 items located; (vi) a statement of the compensation: not located. This is a presence check, not a view on sufficiency.
- Protective order: entered 2026-02-10. Expert's Exhibit A 2026-02-20; provider's Exhibit A as Professional Vendor 2026-02-21; first designated material received 2026-02-24. Return-or-destroy deadline computed from an assumed final disposition date: see front matter page 3.

Scope and limits: the provider lists, counts and computes dates. The expert decides what was considered and relied upon. Nothing here is a view on whether any report, disclosure or file satisfies Rule 26, a state rule or the protective order.

Received log summary

Bates begin opens the first page of each item as bundled. Full columns (file name, SHA-256, transmittal links) are in the register.

Item	Received	From	Bates range	Pages	Designation
1	2026-02-24	Plaintiff	DOE000001 to DOE000412	412	CONFIDENTIAL
2	2026-02-24	Plaintiff	DOE000413 to DOE001190	778	CONFIDENTIAL
3	2026-03-06	Example Medical Center	EMC000001 to EMC000286	286	CONFIDENTIAL
4	2026-03-06	Example Medical Center	EMC000287 to EMC000401	115	CONFIDENTIAL
5	2026-03-20	Example Obstetric Group	EOG000001 to EOG000188	188	CONFIDENTIAL
6	2026-03-27	Plaintiff	DOE001191 to DOE001612	422	CONFIDENTIAL
7	2026-04-03	Plaintiff	DOE001613 to DOE001702	90	CONFIDENTIAL
8	2026-04-10	Example Medical Center	EMC000402 to EMC000530	129	CONFIDENTIAL
9	2026-04-17	Example Medical Center	EMC000531 to EMC000610	80	CONFIDENTIAL
10	2026-05-01	Example Medical Center	EMC000580 to EMC000759	180	CONFIDENTIAL
11	2026-05-15	Plaintiff	DOE001703 to DOE001790	88	CONFIDENTIAL
12	2026-05-29	Plaintiff	DOETR000001 to DOETR000164	164	CONFIDENTIAL
13	2026-06-05	Plaintiff	DOETR000165 to DOETR000372	208	CONFIDENTIAL
14	2026-06-12	Example Medical Center	EMC000760 to EMC000819	60	None stamped
Total pages				3,200	

Bates overlap finding

Items 9 and 10 both carry Bates numbers EMC000580 to EMC000610 (31 numbers). Item 9 was received 2026-04-17 (placental pathology report and laboratory results); item 10 was received 2026-05-01 (supplemental production: NICU nursing flowsheets). The same number opens a different page in each item:

EMC000580: [as stamped in item 9](#) [as stamped in item 10](#)
EMC000610: [as stamped in item 9](#) [as stamped in item 10](#)

The transmittal letters state these ranges as produced (transmittal 09 and 10, bundled). Whether either range is re-stamped is for the producing party and counsel.

Referenced but not received

Each document below is mentioned on a received page and matches no item in the received log. Blue labels open the page that mentions it.

R1. Deposition of C. Placeholder, R.N. (charge nurse), taken 2026-04-29, pages 14 to 31 cited (Deposition transcript).

Mentioned at: [EMC000791](#) [DOETR000087](#) [DOETR000241](#)

R2. Fetal monitoring tracing from the obstetric triage visit of 2025-03-13 (21:42 for 40 minutes) (Fetal monitoring).

Mentioned at: [DOE000180](#) [DOETR000210](#)

R3. MRI brain images of 2025-03-20 (report received; images not received) (Imaging (images)).

Mentioned at: [DOE001641](#)

R4. Anatomy ultrasound report of 2024-10-31, Example Imaging Associates (Imaging report).

Mentioned at: [EOG000077](#)

Protective order dates

The order is a SYNTHETIC form modeled on a published model stipulated protective order; it is not a decision of any court. Dates below are as the documents show them.

Order entered	2026-02-10	Order p.3
Professional Vendors defined (section 2.4); may receive CONFIDENTIAL material after signing Exhibit A (section 7.2(e))		Order p.1
Experts may receive CONFIDENTIAL material after signing Exhibit A (section 7.2(c))		Order p.2
Expert's Exhibit A signed	2026-02-20	Exhibit A p.1
Provider's Exhibit A as Professional Vendor signed	2026-02-21	Exhibit A p.2
First CONFIDENTIAL production received by the expert (item 1)	2026-02-24	DOE000001
Final disposition trigger (section 4): later of dismissal of all claims and defenses, or final judgment after all appeals		Order p.1
Return or destroy, with written certification, within 60 days after final disposition (section 13); PHI including all copies made (section 8)		Order p.2
Final disposition date (SYNTHETIC assumed for demonstration)	2026-12-15	
Computed return-or-destroy and certification deadline (final disposition plus 60 days)	2027-02-13	
Certification sent	not yet due	

Assumed date: the matter is open in this sample, so the final disposition date is an assumed SYNTHETIC input to show the computation. In the register it is an input cell; the deadline and certification status are formulas.

Index of bundled pages

Bundled pages are copies of the source pages, unaltered except for the light blue strip under the red band, which names the bundled page, its source file and page, and links back to page 1.

Page	Bates or label	Why it is bundled	Source file, PDF page
5	DOE000001	First page of item 1	Production 01, p.1
6	DOE000413	First page of item 2	Production 02, p.1
7	EMC000001	First page of item 3	Production 03, p.1
8	EMC000287	First page of item 4	Production 04, p.1
9	EOG000001	First page of item 5	Production 05, p.1
10	DOE001191	First page of item 6	Production 06, p.1
11	DOE001613	First page of item 7	Production 07, p.1
12	EMC000402	First page of item 8	Production 08, p.1
13	EMC000531	First page of item 9	Production 09, p.1
14	EMC000580	First page of item 10	Production 10, p.1
15	DOE001703	First page of item 11	Production 11, p.1
16	DOETR000001	First page of item 12	Production 12, p.1
17	DOETR000165	First page of item 13	Production 13, p.1
18	EMC000760	First page of item 14	Production 14, p.1
19	EMC000580	Overlap: EMC000580 as stamped in item 9	Production 09, p.50
20	EMC000610	Overlap: EMC000610 as stamped in item 9	Production 09, p.80
21	EMC000610	Overlap: EMC000610 as stamped in item 10	Production 10, p.31
22	EMC000791	R1: page that mentions the item	Production 14, p.32
23	DOETR000087	R1: page that mentions the item	Production 12, p.87
24	DOETR000241	R1: page that mentions the item	Production 13, p.77
25	DOE000180	R2: page that mentions the item	Production 01, p.180
26	DOETR000210	R2: page that mentions the item	Production 13, p.46
27	DOE001641	R3: page that mentions the item	Production 07, p.29
28	EOG000077	R4: page that mentions the item	Production 05, p.77
29	Order p.1	Protective order: sections 2.4, 4 and 5	Stipulated Protective Order (form), p.1
30	Order p.2	Protective order: sections 7.2, 8 and 13	Stipulated Protective Order (form), p.2
31	Order p.3	Protective order: entry date	Stipulated Protective Order (form), p.3
32	Exhibit A p.1	Expert's Exhibit A	Exhibit A Acknowledgments, p.1
33	Exhibit A p.2	Provider's Exhibit A as Professional Vendor	Exhibit A Acknowledgments, p.2
34	Transmittal 09	Transmittal letter for item 9	Transmittal Letters, p.9
35	Transmittal 10	Transmittal letter for item 10	Transmittal Letters, p.10

Example Medical Center | Prenatal Clinic Record

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC

Date: 2024-07-08. Gestational age 8w0d.
T 36.9 HR 97 BP 127/64 RR 14 SpO2 100%
Fundal height within 2 cm of dates. Fetal heart tones 136.
Reports normal fetal movement.
Urine dip negative for protein and glucose.
Return in 1 week.
Signed: Clinician (SYNTHETIC)

Example Medical Center NICU | Admission History and Physical

Patient: Baby D. (SYNTHETIC) MRN: SYN-N-0418 DOB: 2025-03-15

Admission: 2025-03-15 03:05. Birth weight 3,310 g. Gestational age 39w1d.

Delivery: emergency cesarean at 02:47 for prolonged fetal bradycardia.

Apgar scores: 1 at 1 minute, 3 at 5 minutes, 5 at 10 minutes.

Resuscitation: positive pressure ventilation from 30 seconds; intubated at 4 minutes; no chest compressions.

Exam at 45 minutes of age: lethargic, hypotonic, weak suck, incomplete Moro. Modified Sarnat: moderate.

Plan: evaluate for therapeutic hypothermia; cord gases pending; aEEG on admission.

Signed: NICU attending (SYNTHETIC) 03:40

Example Medical Center | Fetal Heart Rate and Uterine Activity Tracing

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC Window 2025-03-14 07:45 to 07:49

FHR (bpm)



UA (mmHg)



Annotations: 07:45 provider notified

Printed from the fetal monitoring archive (SYNTHETIC). One page equals four minutes.

Example Medical Center Policy | Fetal Heart Rate Monitoring and Interpretation

Policy manual (SYNTHETIC). Effective 2024-01-01. Page of policy set.

Section 1. Documentation.

Staff complete annual competency validation for this procedure.

Forms referenced are available on the unit intranet.

Approved: Perinatal Committee (SYNTHETIC)

Example Obstetric Group | Prenatal Visit

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC

Date: 2024-07-01. Gestational age 8w0d.

T 36.9 HR 88 BP 112/77 RR 17 SpO2 100%

Fundal height within 2 cm of dates. Fetal heart tones 144.

Mild back discomfort, reassured.

Urine dip negative for protein and glucose.

Return in 2 weeks.

Signed: Clinician (SYNTHETIC)

Sample Children's Hospital | Nutrition Visit

Patient: Baby D. (SYNTHETIC) MRN: SYN-N-0418 DOB: 2025-03-15

Date: 2025-04-10

Weight 8.1 kg. Head circumference tracked on growth chart.

Tracking visually, social smile present.

Parents questions answered.

Signed: Clinician (SYNTHETIC)

Sample Children's Hospital | EEG Report

Patient: Baby D. (SYNTHETIC) MRN: SYN-N-0418 DOB: 2025-03-15

Date: 2025-03-15

Background activity described in the full report.

Report only. Images not included in this production.

Signed: Reader (SYNTHETIC)

Example Medical Center | EHR Audit Trail, L&D Encounter

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC

Timestamp	User	Action	Object
2025-03-14 07:40:00	USER-1050	EDIT	Flowsheet
2025-03-14 07:40:38	USER-1045	PRINT	Results
2025-03-14 07:41:16	USER-1013	SIGN	Flowsheet
2025-03-14 07:41:54	USER-1049	VIEW	EFM annotation
2025-03-14 07:42:32	USER-1022	PRINT	Flowsheet
2025-03-14 07:43:10	USER-1022	VIEW	MAR
2025-03-14 07:43:48	USER-1047	VIEW	Flowsheet
2025-03-14 07:44:26	USER-1008	PRINT	MAR
2025-03-14 07:45:04	USER-1014	PRINT	Nursing note
2025-03-14 07:45:42	USER-1056	EDIT	Flowsheet
2025-03-14 07:46:20	USER-1026	VIEW	MAR
2025-03-14 07:46:58	USER-1014	SIGN	Results
2025-03-14 07:47:36	USER-1026	EDIT	EFM annotation
2025-03-14 07:48:14	USER-1052	VIEW	Results

Example Medical Center Laboratory | Results

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC

Collected: 2025-03-14 08:00

Coagulation panel: results within printed ranges except as flagged.

Flagged: none

Verified by: Laboratory (SYNTHETIC)

Example Medical Center NICU | Nursing Flowsheet

Patient: Baby D. (SYNTHETIC) MRN: SYN-N-0418 DOB: 2025-03-15

Window beginning 2025-03-15 03:00

03:00 HR 131 RR 44 BP 58/38 (MAP 44) SpO2 93%

03:30 Temp 33.5 C Skin checked

Intake 11 mL Output 8 mL

Signed: NICU R.N. (SYNTHETIC)

Example County Early Intervention | Occupational Therapy

Patient: Baby D. (SYNTHETIC) MRN: SYN-N-0418 DOB: 2025-03-15

Date: 2025-06-02

Reviewed home program.

Signed: Provider (SYNTHETIC)

Deposition of R. Specimen, R.N., taken 2026-05-06 (SYNTHETIC transcript)

Page 1

1 SUPERIOR COURT OF EXAMPLE COUNTY (SYNTHETIC)

2

3 Jane Doe, individually and as parent of Baby D., v. Example Medical Center, et

4 al.

5 No. EX-2025-CV-0417

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7 DEPOSITION OF R. SPECIMEN, R.N.

8 Taken 2026-05-06

9 Reported by: Certified reporter (SYNTHETIC)

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11 Appearances:

12 For plaintiff: Sample & Sample LLP

13 For Example Medical Center: Fictive Ford LLP

14 For Example Obstetric Group: Hypothetical Hale PC

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Deposition of B. Template, M.D., taken 2026-05-21 (SYNTHETIC transcript)

Page 1

1 SUPERIOR COURT OF EXAMPLE COUNTY (SYNTHETIC)

2

3 Jane Doe, individually and as parent of Baby D., v. Example Medical Center, et

4 al.

5 No. EX-2025-CV-0417

6

7 DEPOSITION OF B. TEMPLATE, M.D.

8 Taken 2026-05-21

9 Reported by: Certified reporter (SYNTHETIC)

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11 Appearances:

12 For plaintiff: Sample & Sample LLP

13 For Example Medical Center: Fictive Ford LLP

14 For Example Obstetric Group: Hypothetical Hale PC

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Defendant Example Medical Center's Supplemental Responses to Interrogatories, Set Two

Jane Doe v. Example Medical Center, No. EX-2025-CV-0417 (SYNTHETIC)

INTERROGATORY NO. 1: Identify the custodian of reviewed the fetal monitoring tracing.

RESPONSE TO INTERROGATORY NO. 1: Responding party incorporates its general objections. Without waiving them, responding party refers to the documents produced in this action.

Example Medical Center Laboratory | Results

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC

Collected: 2025-03-17 09:30

Coagulation panel: results within printed ranges except as flagged.

Flagged: none

Verified by: Laboratory (SYNTHETIC)

Example Medical Center Laboratory | Results

Patient: Baby D. (SYNTHETIC) MRN: SYN-N-0418 DOB: 2025-03-15

Collected: 2025-03-19 06:30

Blood culture: results within printed ranges except as flagged.

Flagged: WBC high

Verified by: Laboratory (SYNTHETIC)

Example Medical Center NICU | Nursing Flowsheet

Patient: Baby D. (SYNTHETIC) MRN: SYN-N-0418 DOB: 2025-03-15

Window beginning 2025-03-16 09:00

09:00 HR 125 RR 43 BP 52/35 (MAP 50) SpO2 97%

09:30 Temp 36.5 C Skin checked

Intake 28 mL Output 19 mL

Signed: NICU R.N. (SYNTHETIC)

Defendant Example Medical Center's Supplemental Responses to Interrogatories, Set Two

Jane Doe v. Example Medical Center, No. EX-2025-CV-0417 (SYNTHETIC)

INTERROGATORY NO. 14: Identify each person who staffed the labor and delivery charge nurse position on 2025-03-14 to 2025-03-15.

RESPONSE TO INTERROGATORY NO. 14: Responding party incorporates its general objections. Without waiving them,

responding party states: C. Placeholder, R.N., served as charge nurse from 19:00 on 2025-03-14 to 07:00 on 2025-03-15. Further information responsive to this interrogatory appears in the deposition of C. Placeholder, R.N., taken April 29, 2026, at pages 14 to 31.

INTERROGATORY NO. 15: Identify each version of the fetal monitoring policy in effect in 2025.

RESPONSE TO INTERROGATORY NO. 15: See EMC000287 to EMC000401.

Deposition of R. Specimen, R.N., taken 2026-05-06 (SYNTHETIC transcript)

Page 87

1 Q. Before today, did you review any other deposition in this case?

2 A. No.

3 Q. Are you aware that C. Placeholder, the charge nurse, was deposed?

4 A. I heard her deposition was taken on April 29. I have not read it.

5 Q. Did you speak with Nurse Placeholder about her testimony?

6 A. No.

7 Q. Who was the charge nurse when the prolonged deceleration began?

8 A. Nurse Placeholder.

9 Q. Did she come to the room?

10 A. Yes, at about 02:20.

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Deposition of B. Template, M.D., taken 2026-05-21 (SYNTHETIC transcript)

Page 77

1 Q. Nurse Placeholder testified at her deposition that she called you at 02:10.

2 Do you agree?

3 MR. FICTIVE: Objection, form. Misstates the record.

4 Q. You may answer.

5 A. I do not recall a call at 02:10. I was in the room by then.

6 Q. Have you read her transcript?

7 A. I read the portion counsel sent me.

8 Q. Did you bring that portion today?

9 A. No.

10 Q. Let us mark the next exhibit.

11 (Template Exhibit 7 marked for identification.)

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Example Medical Center | Obstetric Triage Note

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC

Date of service: 2025-03-13 Arrival 21:30 Departure 23:10

Chief complaint: contractions every 6 to 8 minutes since 18:00. Gestational age 38w6d by EDD 2025-03-21.

Cervix 2 cm / 60% / -2 on arrival; unchanged at 22:50 recheck. Membranes intact.

External fetal monitoring applied 21:42 for 40 minutes. Baseline 135, moderate variability, accelerations present.

EFM tracing archived to the fetal monitoring system per unit practice. Tracing not printed to chart.

Disposition: discharged home in stable condition with labor precautions. Return if contractions every 5 minutes.

Signed: Triage R.N. (SYNTHETIC) 23:14

Deposition of B. Template, M.D., taken 2026-05-21 (SYNTHETIC transcript)

Page 46

1 Q. Doctor, when you arrived at 01:15, what did you see on the tracing?

2 A. Minimal variability and recurrent late decelerations.

3 Q. What was your plan at that time?

4 A. Continue resuscitative measures and reassess. She was 8 centimeters.

5 Q. When did you decide on a cesarean?

6 A. At 02:24, after the deceleration that began at 02:18 did not recover.

7 Q. What was the decision-to-incision interval?

8 A. Seventeen minutes. Incision was at 02:41.

9 Q. Were you aware of the tracing from the triage visit on March 13?

10 A. I did not look at it that night.

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Sample Children's Hospital Radiology | MRI Brain Without Contrast

Patient: Baby D. (SYNTHETIC) MRN: SYN-N-0418 DOB: 2025-03-15

Date of exam: 2025-03-20 (day of life 5). Performed at Example Medical Center, read by outside radiologist.

Findings: restricted diffusion in the bilateral ventrolateral thalami and posterior putamina.

Posterior limb of the internal capsule signal abnormal bilaterally. No hemorrhage. No mass effect.

Impression: pattern involving the basal ganglia and thalami (SYNTHETIC report).

Images available on PACS. Copy of images provided to family on CD at discharge.

Signed: Radiologist (SYNTHETIC)

Example Obstetric Group | Prenatal Visit

Patient: Jane Doe (SYNTHETIC) MRN: SYN-M-0417 DOB: SYNTHETIC

Date: 2024-11-04. Gestational age 21w3d.

Anatomy ultrasound performed 2024-10-31 at Example Imaging Associates; report requested, to be scanned on receipt.

Patient reports normal fetal movement. BP 112/70. Fundal height 21 cm.

Signed: Obstetrician (SYNTHETIC)

SUPERIOR COURT OF EXAMPLE COUNTY (SYNTHETIC)

Jane Doe, individually and as parent of Baby D., v. Example Medical Center, et al.

Case No. EX-2025-CV-0417

STIPULATED PROTECTIVE ORDER (SYNTHETIC FORM)

SYNTHETIC FORM, NOT A DECISION. This stipulated protective order is an invented form for a synthetic matter, modeled on a published model stipulated protective order. No court entered it.

1. PURPOSES AND LIMITATIONS

Disclosure and discovery activity in this action are likely to involve production of confidential, proprietary, or private information, including protected health information, for which special protection from public disclosure and from use for any purpose other than prosecuting this litigation may be warranted. The parties stipulate to and petition the court to enter this Stipulated Protective Order.

2. DEFINITIONS

2.1

Designating Party: a Party or Non-Party that designates information or items that it produces in disclosures or in responses to discovery as "CONFIDENTIAL."

2.2

Expert: a person with specialized knowledge or experience in a matter pertinent to the litigation who has been retained by a Party or its counsel to serve as an expert witness or as a consultant in this action.

2.3

Producing Party: a Party or Non-Party that produces Disclosure or Discovery Material in this action.

2.4

Professional Vendors: persons or entities that provide litigation support services (e.g., photocopying, videotaping, translating, preparing exhibits or demonstrations, and organizing, storing, or retrieving data in any form or medium) and their employees and subcontractors.

2.5

Protected Material: any Disclosure or Discovery Material that is designated as "CONFIDENTIAL."

2.6

Receiving Party: a Party that receives Disclosure or Discovery Material from a Producing Party.

3. SCOPE

The protections conferred by this Stipulation and Order cover Protected Material and any information copied or extracted from Protected Material, all copies, excerpts, summaries, or compilations of Protected Material.

4. DURATION

Even after final disposition of this litigation, the confidentiality obligations imposed by this Order shall remain in effect until a Designating Party agrees otherwise in writing or a court order otherwise directs. Final disposition shall be deemed to be the later of (1) dismissal of all claims and defenses in this action, with or without prejudice; and (2) final judgment herein after the completion and exhaustion of all appeals, rehearings, remands, trials, or reviews of this action, including the time limits for filing any motions or applications for extension of time pursuant to applicable law.

5. DESIGNATING PROTECTED MATERIAL

Each Party or Non-Party that designates information or items for protection under this Order must take care to limit any such designation to specific material that qualifies under the appropriate standards. Documents

shall be designated by affixing the legend "CONFIDENTIAL" to each page that contains Protected Material. This Order provides one designation level: CONFIDENTIAL.

6. CHALLENGING CONFIDENTIALITY DESIGNATIONS

Any Party may challenge a designation of confidentiality at any time, following the meet and confer procedure stated in this section.

7. ACCESS TO AND USE OF PROTECTED MATERIAL

7.1

Basic Principles. A Receiving Party may use Protected Material that is disclosed or produced by another Party or by a Non-Party in connection with this case only for prosecuting, defending, or attempting to settle this litigation.

7.2

Disclosure of "CONFIDENTIAL" Information or Items. Unless otherwise ordered by the court or permitted in writing by the Designating Party, a Receiving Party may disclose any information or item designated "CONFIDENTIAL" only to: (a) the Receiving Party's Outside Counsel of Record in this action; (b) the officers, directors, and employees of the Receiving Party to whom disclosure is reasonably necessary for this litigation and who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A); (c) Experts (as defined in this Order) of the Receiving Party to whom disclosure is reasonably necessary for this litigation and who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A); (d) the court and its personnel; (e) court reporters and their staff, professional jury or trial consultants, mock jurors, and Professional Vendors to whom disclosure is reasonably necessary for this litigation and who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A); (f) the author or recipient of a document containing the information.

8. PROTECTED HEALTH INFORMATION

This Order is intended to operate as a qualified protective order for protected health information produced in this action. The parties shall not use or disclose protected health information for any purpose other than this litigation, and at the end of the litigation shall return to the covered entity or destroy the protected health information (including all copies made), as provided in section 13.

9 TO 12. [Sections on subpoenas in other litigation, non-party material, unauthorized disclosure, and filing under seal, following the model form. Omitted from this synthetic sample.]

13. FINAL DISPOSITION

Within 60 days after the final disposition of this action, as defined in paragraph 4, each Receiving Party must return all Protected Material to the Producing Party or destroy such material. As used in this subdivision, "all Protected Material" includes all copies, abstracts, compilations, summaries, and any other format reproducing or capturing any of the Protected Material. Whether the Protected Material is returned or destroyed, the Receiving Party must submit a written certification to the Producing Party (and, if not the same person or entity, to the Designating Party) by the 60 day deadline that (1) identifies (by category, where appropriate) all the Protected Material that was returned or destroyed and (2) affirms that the Receiving Party has not retained any copies, abstracts, compilations, summaries or any other format reproducing or capturing any of the Protected Material.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: 2026-02-06 /s/ P. Sample (SYNTHETIC), Sample & Sample LLP, Attorneys for Plaintiff

DATED: 2026-02-06 /s/ F. Fictive (SYNTHETIC), Fictive Ford LLP, Attorneys for Defendant Example Medical Center

DATED: 2026-02-06 /s/ H. Hale (SYNTHETIC), Hypothetical Hale PC, Attorneys for Defendant Example Obstetric Group

PURSUANT TO STIPULATION, IT IS SO ORDERED.

ENTERED: 2026-02-10 /s/ Judge of the Superior Court (SYNTHETIC FORM; no court entered this order)

EXHIBIT A

ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND (SYNTHETIC)

I, A. Example, M.D. (SYNTHETIC), of Example Neonatal Associates, 100 Sample Way, Example City, State of Example, declare under penalty of perjury that I have read in its entirety and understand the Stipulated Protective Order that was issued by the Superior Court of Example County (SYNTHETIC) on 2026-02-10 in the case of Jane Doe, individually and as parent of Baby D., v. Example Medical Center, et al., No. EX-2025-CV-0417. I agree to comply with and to be bound by all the terms of this Stipulated Protective Order and I understand and acknowledge that failure to so comply could expose me to sanctions and punishment in the nature of contempt. I solemnly promise that I will not disclose in any manner any information or item that is subject to this Stipulated Protective Order to any person or entity except in strict compliance with the provisions of this Order.

Role: Expert retained by plaintiff's counsel

Date: 2026-02-20

City and State where sworn and signed: Example City, State of Example (SYNTHETIC)

Printed name: A. Example, M.D. (SYNTHETIC)

Signature: /s/ A. Example (SYNTHETIC)

EXHIBIT A

ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND (SYNTHETIC)

I, Litigation support provider (SYNTHETIC), of Address on file (SYNTHETIC), declare under penalty of perjury that I have read in its entirety and understand the Stipulated Protective Order that was issued by the Superior Court of Example County (SYNTHETIC) on 2026-02-10 in the case of Jane Doe, individually and as parent of Baby D., v. Example Medical Center, et al., No. EX-2025-CV-0417. I agree to comply with and to be bound by all the terms of this Stipulated Protective Order and I understand and acknowledge that failure to so comply could expose me to sanctions and punishment in the nature of contempt. I solemnly promise that I will not disclose in any manner any information or item that is subject to this Stipulated Protective Order to any person or entity except in strict compliance with the provisions of this Order.

Role: Professional Vendor engaged through the expert

Date: 2026-02-21

City and State where sworn and signed: Example City, State of Example (SYNTHETIC)

Printed name: Litigation support provider (SYNTHETIC)

Signature: /s/ Litigation support provider (SYNTHETIC)

Sample & Sample LLP (SYNTHETIC)

200 Placeholder Avenue, Example City, State of Example | invented firm for demonstration

2026-04-17

VIA SECURE FILE TRANSFER

A. Example, M.D. (SYNTHETIC)

Example Neonatal Associates

100 Sample Way, Example City, State of Example

Re: Doe v. Example Medical Center (SYNTHETIC), Superior Court of Example County, No.

EX-2025-CV-0417

Our transmittal reference: SS-DOE-T09

Dear Dr. Example:

Enclosed is Example Medical Center's production served on 2026-04-15: Placental pathology report and laboratory results, bearing Bates numbers EMC000531 through EMC000610 (80 pages).

These materials are designated CONFIDENTIAL under the Stipulated Protective Order entered 2026-02-10. Your signed Acknowledgment (Exhibit A) dated 2026-02-20 is on file with us.

Please confirm receipt.

Very truly yours,

/s/ P. Sample (SYNTHETIC)

Sample & Sample LLP

Sample & Sample LLP (SYNTHETIC)

200 Placeholder Avenue, Example City, State of Example | invented firm for demonstration

2026-05-01

VIA SECURE FILE TRANSFER

A. Example, M.D. (SYNTHETIC)

Example Neonatal Associates

100 Sample Way, Example City, State of Example

Re: Doe v. Example Medical Center (SYNTHETIC), Superior Court of Example County, No.

EX-2025-CV-0417

Our transmittal reference: SS-DOE-T10

Dear Dr. Example:

Enclosed is Example Medical Center's production served on 2026-04-28: Supplemental production: NICU nursing flowsheets, bearing Bates numbers EMC000580 through EMC000759 (180 pages).

These materials are designated CONFIDENTIAL under the Stipulated Protective Order entered 2026-02-10. Your signed Acknowledgment (Exhibit A) dated 2026-02-20 is on file with us.

Please confirm receipt.

Very truly yours,

/s/ P. Sample (SYNTHETIC)

Sample & Sample LLP