United States District Court Southern District of Texas

ENTERED

March 12, 2025
Nathan Ochsner, Clerk

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

٧.

U.S. ANESTHESIA PARTNERS, INC., et al.

Defendants.

Case No.: 4:23-CV-03560-KH

Joint Stipulation [DE 250]

WHEREAS, on May 28, 2024, the Court entered the Protective Order, Dkt. Nos. 149-1, 152;

WHEREAS, on December 30, 2024, the Federal Trade Commission and U.S. Anesthesia Partners, Inc. (together, "the Parties"), filed a Joint Motion to Enter Supplemental Protective Order, Dkt. No. 185;

IT IS HEREBY STIPULATED AND AGREED

1. Upon request from a nonparty Producing Party, the Parties will not show, describe, summarize, or otherwise reveal the contents of Confidential or Highly Confidential documents to any "Witness," (as defined in Section 3(n) of the Protective Order, Dkt. No. 149-1), unless that person is otherwise authorized to view those materials under Section 3 or Section 4, respectively, of the Protective Order. The Parties further agree to be bound by the terms of this Stipulation pending entry by the Court of this Stipulation.

- 2. Nothing in this Stipulation prevents the parties to Electrical Medical Trust, et al. v. U.S. Anesthesia Partners, Inc., et al., No. 4:23-cv-04398 (S.D. Tex.; Bennett, J.) from utilizing Confidential or Highly Confidential Material in connection with that action, provided that a protective or confidentiality order is entered in that case that provides protections for Confidential and Highly Confidential Material comparable to the protections for such information contained in the Protective Order, the Supplemental Protective Order, and this Joint Stipulation.
 - 3. For the avoidance of doubt, the Protective Order is still in effect.

IT IS SO ORDERD.

Dated: March 11, 2025

United States District Judge