

B. Challenging "Confidential" or "Attorneys' Eyes Only" Designations: Prior to the filing of any motion seeking to challenge the designation of information as "Confidential" or "Attorneys' Eyes Only" as set forth in Section IV above, the parties will request a telephonic conference with the Magistrate Judge to discuss the issue, following which the contesting party may move for an order removing or altering the "Confidential" or "Attorneys' Eyes Only" designation with regard to such document(s).

Additionally, if any proposed protective order purports to allow documents to be designated as "Attorneys' Eyes Only," such proposed order must include a precise definition of the documents that may be designated as "Attorneys' Eyes Only" pursuant to the order.

A motion for the entry of an agreed protective order should be filed as soon as practicable, but in any event no later than 14 days prior to the **original** due date for any discovery response with regard to which the responding party proposes to rely upon the protective order when responding.

SO ORDERED.

Dated: 26 FEB 2021



Mark J. Dinsmore
United States Magistrate Judge
Southern District of Indiana

Distribution:

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