

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MAINE**

DANIEL B. LOCKE, et al.,)	
)	
Plaintiffs)	
)	
v.)	CIVIL ACTION NO. 2:05-CV-00112-GZS
)	
EDWARD A. KARASS, in his official)	
capacity as Controller of the State of)	
Maine, et al.,)	
)	
Defendants)	

Consent Confidentiality Order

The parties to this Consent Confidentiality Order have agreed to the terms of this Order; accordingly, it is ORDERED:

1. This Order applies to all documents produced in the course of discovery that are within the scope of 1 M.R.S.A. §402(3)(D). Defendants shall designate the documents to which this applies, and Plaintiffs may request *in camera* review of the documents by the Court, if they dispute the Defendants' designation.

2. Counsel for the Plaintiffs may disclose these documents to the Plaintiffs and to experts retained by the Plaintiffs but shall not furnish copies of such documents to anyone other than co-counsel and members of Counsel's own staff.

3. This Order shall be subject to modification by the Court on its own motion or on motion of a party or any other person with standing concerning the subject matter. Motions to modify this Order shall be served and filed under Local Rule 7.

4. This Order is entered based on the representations and agreements of the parties and for the purpose of facilitating discovery. Nothing herein shall be construed or presented as a judicial determination that any documents or information designated by counsel or the parties is subject to protection under Rule 26(c) of the Federal Rules of Civil Procedure or otherwise until such time as the Court may rule on a specific document or issue.

5. This Order shall take effect when entered and shall be binding upon all counsel and their law firms, the parties, and persons made subject to this Order by its terms.

So Ordered.

Dated:

U.S. District Judge
U.S. Magistrate Judge