

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO
Judge John L. Kane**

Master Docket No. **09-md-02063-JLK-KMT** (MDL Docket No. 2063)

IN RE: OPPENHEIMER ROCHESTER FUNDS GROUP SECURITIES LITIGATION

This document relates to all the MDL actions.

**STIPULATED ORDER REGARDING INADVERTENTLY PRODUCED PRIVILEGED
MATERIALS OR INFORMATION**

In order to ensure that neither party waives any privilege through the inadvertent production of privileged materials or information, and pursuant to Rule 502 of the Federal Rules of Evidence, Plaintiffs and Defendants, by and through their respective counsel of record, hereby stipulate as follows:

1. Inadvertent production or disclosure of documents or information subject to the attorney-client privilege, work product immunity, or any other applicable privilege shall not constitute a waiver of, nor a prejudice to, any claim that such or related material is privileged or protected by the work product immunity or any other applicable privilege, provided that the producing party notifies the receiving party in writing promptly after discovery of such inadvertent production.

2. Such inadvertently produced documents or information, including all copies thereof, shall be returned to the producing party or destroyed immediately upon request.

3. No use shall be made of such documents or information during deposition or at trial, nor shall such documents or information be shown to anyone who has not already been given access to them subsequent to the request that they be returned.

4. In the case of an inadvertently produced document, the producing party shall then provide a privilege log identifying such inadvertently produced document.

5. The receiving party may move the Court for an Order compelling production of any inadvertently produced document or information, but the motion shall not assert as a ground for production the fact or circumstances of the inadvertent productions or raise any other issue concerning such inadvertent production that is inconsistent with Rule 502 of the Federal Rules of Evidence, nor shall the motion disclose or otherwise use the content of the inadvertently produced document or information (beyond any information appearing on the above-referenced privilege log) in any way in connection with any such motion.

IT IS SO ORDERED.

DATED this 20th day of January, 2012.

BY THE COURT:

s/John L. Kane
John L. Kane
United States District Court Judge

APPROVED:

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A C K N O W L E D G E M E N T

The undersigned hereby acknowledges that he/she has read the PROTECTIVE ORDER which was entered by the Court on January ___, 2012, in *In re: Oppenheimer Rochester Funds Group Securities Litigation*, Master Docket No. 09-md-02063-JLK-KMT (MDL Docket No. 2063), that he/she is one of the persons contemplated in paragraph 3 thereof as authorized to receive disclosure of RECORDS designated CONFIDENTIAL MATERIAL by any of the parties or by third parties, and that he/she fully understand and agrees to abide by the obligations and conditions of the Protective Order. The undersigned further consents to be subject to the jurisdiction of the United States District Court for the District of Colorado for purposes of any proceedings relating to performance under, compliance with or violation of the above-described Order.

Dated: January ___, 2012