

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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TEAM OF DESTINY, INC.

Plaintiff,

v.

SCOTT A. LARSEN,

Defendant.

Case No. 1:04-CV-0165

Honorable Ellen S. Carmody

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Thomas A. Kuiper (P47285)  
WHEELER UPHAM, P.C.  
Attorneys for Plaintiff  
40 Pearl St., NW, Suite 200  
Grand Rapids, Michigan 49503  
(616) 459-7100

Dawn Phillips Hertz (P18868)  
J. Michael Huget (P39150)  
Eileen E Pott (P66264)  
BUTZEL LONG, PC  
Attorneys for Defendant  
350 S. Main St., Ste. 300  
Ann Arbor, MI 48104  
(734) 995-3110

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**STIPULATION AND ORDER FOR PROTECTIVE ORDER**

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The parties, by their respective counsel, hereby stipulate and agree as follows:

1. Pursuant to the agreement of the parties and the Court's Case Management Order, the parties are to participate in voluntary facilitative mediation. The parties have jointly selected William Jack to serve as their facilitative mediator.
2. Mr. Jack has met and/or talked with the parties and their counsel, and he has scheduled a facilitative mediation date for November 22, 2004 in Ann Arbor, Michigan.
3. The parties desire to maintain the confidentiality of the mediation process and, as a result, now stipulate to the entry of a protective order.

4. The parties agree that Scott Larsen, Orrin Woodward, and Chris Brady, along with their counsel, shall be personally and physically present at the facilitative mediation on November 22, 2004 in Ann Arbor, Michigan.

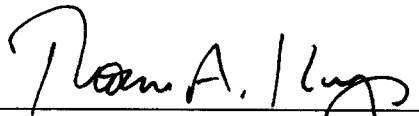
5. The parties agree that the facilitative mediation process shall be kept confidential by the parties, their principals, and all attorneys involved in the process. This blanket confidentiality protection includes the mediation itself, the observations of or about mediation and the process, and any statements made in, during, or in connection with the facilitative mediation.

6. In the event that any party breaches the mutual confidentiality requirement, the breaching party may, within the discretion of this Court, be liable for damages, including actual attorneys' fees awarded to the non-breaching party, court costs, the entire cost of the facilitative mediation, and any potential fine for contempt of court.

7. Effective as of October 26, 2004, and during the process of mediation, Defendant (in his own name or any pseudonym) shall not author or post any new entry on the Internet that is critical of Plaintiff or its members.

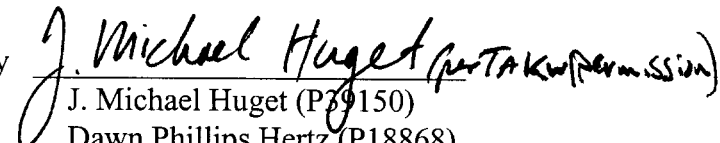
Dated: November 4, 2004

WHEELER UPHAM, P.C.  
Attorneys for Plaintiff

By   
Thomas A. Kuiper (P47285)

Dated: November 4, 2004

BUTZEL LONG, P.C.  
Attorneys for Defendant

By  (per T.A. Kuiper permission)  
J. Michael Huget (P39150)  
Dawn Phillips Hertz (P18868)  
J. Michael Huget (P39150)  
Eileen E Pott (P66264)

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**ORDER**

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At a session of this Court held in the  
United States District Court for the  
Western District of Michigan,  
Southern Division.

PRESENT: HON. ELLEN S. CARMODY  
U.S. Magistrate Judge

In accordance with the above Stipulation, IT IS SO ORDERED.

Dated: November \_\_\_\_, 2004

\_\_\_\_\_  
Hon. Ellen S. Carmody

ATTEST: A TRUE COPY

\_\_\_\_\_  
Deputy Clerk

4. The parties agree that Scott Larsen, Orrin Woodward, and Chris Brady, along with their counsel, shall be personally and physically present at the facilitative mediation on November 22, 2004 in Ann Arbor, Michigan.

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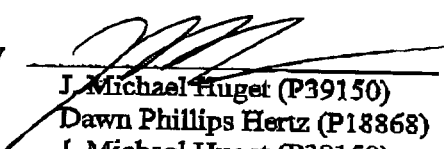
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