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Attorneys for Defendant/Third-Party Plaintiff
InterDent Service Corporation

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF IDAHO

POCATELLO DENTAL GROUP, P.C., an
Idaho professional corporation,

Plaintiff,

v.

INTERDENT SERVICE CORPORATION, a
Washington corporation,

Defendant.

INTERDENT SERVICE CORPORATION, a
Washington corporation,

Third-Party Plaintiff,

v.

POCATELLO DENTAL GROUP, P.C., an

Case No. CV-03-450-E-LMB

DECLARATION OF COUNSEL FOR
INTERDENT SERVICE
CORPORATION IN RESPONSE TO
PROPOSED PROTECTIVE ORDER
SUBMITTED BY COUNSEL LOWELL
HAWKES

DECLARATION OF COUNSEL FOR INTERDENT SERVICE CORPORATION IN
RESPONSE TO PROPOSED PROTECTIVE ORDER SUBMITTED BY COUNSEL LOWELL
HAWKES - 1

U.S. COURTS
6: AUG 23 2003
JAMES HAWKES
IDAHO

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Idaho professional corporation; DWIGHT G. ROMRIELL, individually; LARRY R. MISNER, JR., individually; GREGORY ROMRIELL, individually; ERROL ORMOND, individually; and ARNOLD GOODLIFFE, individually,

Third-Party Defendants.

I, DARIAN A. STANFORD, declare as follows:

1. I am an associate at Stoel Rives LLP and one of the attorneys representing defendant and third-party plaintiff InterDent Service Corporation ("ISC").
2. I submit this declaration in response to the declaration submitted by Lowell Hawkes, counsel for third-party defendants Dwight Romriell, Greg Romriell, Errol Ormond and Arnold Goodliffe.
3. ISC is forced to reject the proposed protective order submitted by Mr. Hawkes because, among other things, it does not comply with the law, namely the Health Insurance Portability and Accountability Act of 1996.
4. Consistent with the Court's August 16, 2004 Order, counsel will continue to work towards entering into a stipulated protective order and will hopefully do so before August 27, 2004. If counsel are unable to agree before that time, the Court indicated that it would then rule on ISC's Motion for Protective Order (Docket No. 146), which is already before the Court and which all parties save Mr. Hawkes already signed.

EXECUTED this 20th day of August, 2004


DARIAN A. STANFORD

DECLARATION OF COUNSEL FOR INTERDENT SERVICE CORPORATION IN
RESPONSE TO PROPOSED PROTECTIVE ORDER SUBMITTED BY COUNSEL LOWELL
HAWKES - 2

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of August, 2004, I caused to be served a true copy of the foregoing **DECLARATION OF COUNSEL FOR INTERDENT SERVICE CORPORATION IN RESPONSE TO PROPOSED PROTECTIVE ORDER SUBMITTED BY COUNSEL LOWELL HAWKES** upon the following:

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DATED: this 20th day of August, 2004.



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