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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

FARNIA IGHANI,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 07-CV-1389-WEB
)	
AMERICAN FAMILY MUTUAL INSURANCE)	
COMPANY, a foreign Wisconsin corporation,)	
and STEPHEN R. VAN DYKE, an individual,)	
)	
Defendants.)	
)	

Pursuant to Chapter 60 K.S.A.

**AGREED ORDER FOR INSPECTION AND
REPRODUCTION OF RECORDS, INCLUDING
PROTECTED HEALTH INFORMATION
PURSUANT TO STATE AND FEDERAL LAW (HIPAA)**

TO: Educational Institutions, Employers Past and Present, All Hospitals, Clinics, Pharmacies, Physicians, Laboratories, Social Workers, Counselors, Psychologists, Psychiatrists, Therapists, Medical Institutions, Health Care Providers, Governmental Agencies (State and Federal) and Insurance Companies.

NOW on this 19th day off February, 2008, this matter comes before the Court on the application of the parties for an order directing those referenced above to produce for inspection and reproduction any and all records, documents, or other information within their

custody and/or control pertaining to Plaintiff, **FARNIA IGHANI, SSN:***-**-2715; DOB: **/1976.** Plaintiff appears by and through her attorney Stephen L. Brave of Affiliated Attorneys of Pistotnik Law Offices, P.A., 2831 E. Central, Wichita, Kansas 67214. Defendant American Family Mutual Insurance Company appears by and through its attorney Roarke R. Gordon of Fleeson, Gooing, Coulson & Kitch, L.L.C., 1900 Epic Center, 301 N. Main, Wichita, Kansas 67202. There are no other appearances.

WHEREUPON, being adequately advised, the Court hereby finds and orders:

You are hereby authorized, directed and ordered pursuant to the laws of Kansas and applicable federal law, including but not limited to the Health Insurance Portability and Accountability Act (HIPAA), to make available for inspection and reproduction by the parties, their counsel denominated in this lawsuit, any and all records, documents, and other information of any type or nature whatsoever, including any and **all** protected health information, correspondence and billings, within your care, custody, or control, concerning Plaintiff, **FARNIA IGHANI**, whose Social Security Number (last four digits) is 2715.

This Court finds the disclosure of the records, documents, and other information subject to this Order is necessary to this proceeding because the condition of the plaintiff is an element or factor of the plaintiff's claim. Unless specifically excluded by this Order, ALL records, documents, or other information, including protected health information, in your possession regarding the person noted above shall be produced for inspection and reproduction. Such production may be requested by any attorney of record herein as set forth below, and clerical fees and expenses as permitted shall be paid by the attorney requesting

the same.

This Order does not, however, provide for the production of any medical records maintained in connection with any program relating to substance abuse education, prevention, training, treatment, rehabilitation or research, which are conducted, regulated, or directly or indirectly assisted by any department or agency of the United States, and which are covered by the provisions of 42 U.S.C. § 290dd-2 and 42 C.F.R., Part 2.

This Order complies with HIPAA federal standards for privacy of individually identifiable health information, **45 C.F.R. Parts 160 and 164**, and with Kansas law regarding the disclosure of health care information.

This Order shall be effective throughout the pendency of this action.

IT IS SO ORDERED.

/s/ DONALD W. BOSTWICK

U.S. Magistrate Judge

APPROVED BY:

/s/ Roarke R. Gordon
Brian R. Collignon - #22701
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