


7. Counsel for the witness may instruct the witness not to answer questions concerning any privileged matters, or matters precluded by prior rulings of the Court or the Special Discovery Master, or in violation of discovery agreements between the parties.
8. No documentary evidence or exhibits shall be presented to the witness in connection with the interview of that witness.
9. Each party is permitted to utilize only one questioner during the course of a single interview.
10. Re-interviews shall not be permitted except upon a showing of good cause.
11. In the event that any party requests an interview, the other party shall, within fourteen (14) days, agree or decline to produce the witness for an interview or, in the event the witness cannot be located, provide a status report on efforts to contact the witness. In the event that any party provides a status report, it shall be updated at 10-day intervals. In the event that any party declines to produce a witness for an interview, that party shall, within seven (7) calendar days of the denial of the interview, either agree to accept service of a subpoena for the witness (if required) or provide the last known address of the witness to the requesting party. Nothing in this paragraph shall be deemed a waiver of any party's right to object to a notice of deposition or to move for a protective order under the Superior Court Civil Rules or Case Management Orders then in effect.

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IT IS SO ORDERED this _____ day of _____, 1993.

Harvey B. Rubenstein
 Special Discovery Master