

UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA

JAMES WILLSTROP, SAURAV GHOSAL,)
NICOL DAVID AND Camille SERME)

Plaintiffs,)

v.)

Case No.: 17-CV-00350-LSC-CRZ

PRINCE MARKETING LLC, PRINCE GLOBAL)
SPORTS LLC, PRINCE SQUASH, LLC)
WAITT BRANDS, LLC, ATHLETIC)
BRANDS HOLDING COMPANY and)
AUTHENTIC BRANDS GROUP, LLC)

Defendants.)

AGREED CONFIDENTIALITY AND PROTECTIVE ORDER

Plaintiffs James Willstrop, Saurav Ghosal, Nicol David and Camille Serme. (“Plaintiffs”) and Defendants, Prince Marketing, LLC, Prince Global Sports, LLC, Prince Squash, LLC, Wait Brands, LLC and Authentic Brands Group, LLC (“Defendants”) agree that during the course of this action certain information and/or documentation may be produced which raise issues related to rights of privacy, trade secrets, or confidentiality. Plaintiffs and Defendants ask that a confidentiality and protective order be entered by this Court and that said order protect confidential information from inappropriate disclosure. Plaintiffs and Defendants have therefore stipulated that this confidentiality and protective order (the “Protective Order”) may be entered by the Court and that it shall govern all confidential information produced in these proceedings. By entering this Protective Order, the Court does not intend to create any presumption with

regard to the actual confidentiality of any information or documents, or to alter the normal burden of proof necessary for obtaining a protective order from the Court. Accordingly,

IT IS HEREBY ORDERED that the parties' motion, (Filing No. 102), is granted as follows:

1. Definition of Confidential Information.

“Confidential Information” as used herein means any type or classification of information which is designated as CONFIDENTIAL by the supplying party, whether it be documents, information revealed during a deposition, information revealed in an interrogatory answer, or otherwise, to or for any of the parties in this litigation. Materials designated as CONFIDENTIAL may be disclosed only to persons described in Paragraphs 3(A), 3(B), 3(C) and 3(D). In designating information as CONFIDENTIAL, a party will make such designation only as to that information the party in good faith believes contains confidential information.

2. Designation of Confidential Information.

Each deposition transcript page or portion thereof, each interrogatory answer or portion thereof, each produced document or portion thereof, each thing or portion thereof, and each answer to a request for admission or portion thereof, which in good faith is deemed by counsel for a party to disclose confidential information of that party, shall be so identified and marked CONFIDENTIAL by that party's counsel.

Such identification and marking shall be made: (a) in the case of an answer to an interrogatory or a response to a request for admission, at the time when the answer or response is served on the requesting party; (b) in the case of another document, when a copy of the document is provided to another party; or (c) in the case of an inspection of premises or things, either orally on the record at the time of the inspection (if there is a record of the inspection to be transcribed), or in a written notice delivered to counsel for the other party within ten (10) days

July 11, 2018.

BY THE COURT:

A handwritten signature in blue ink, appearing to read "Cheryl R. Zwart", is written over a horizontal line.

Cheryl R. Zwart
United States Magistrate Judge

