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5 Attorneys for Plaintiff

6 UNITED STATES DISTRICT COURT
7 DISTRICT OF ARIZONA

8 FIRETRACE USA, LLC, a Delaware
corporation,
9
Plaintiff,
10
vs.
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LAWRENCE JESCLARD and CANDICE
12 JESCLARD, husband and wife; and HAZARD
PROTECTION SYSTEMS, an Alaska
13 corporation,
14
Defendants.

No. _____

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19 **LODGED: Proposed Order Granting Expedited Discovery**
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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF ARIZONA

8 FIRETRACE USA, LLC, a Delaware
9 corporation,

10 Plaintiff,

11 vs.

12 LAWRENCE JESCLARD and CANDICE
13 JESCLARD, husband and wife; and HAZARD
14 PROTECTION SYSTEMS, an Alaska
15 corporation,

16 Defendants.

No. _____

[PROPOSED]
ORDER GRANTING EXPEDITED
DISCOVERY

17 This Court, having considered plaintiff Firetrace USA, LLC's ("Firetrace") Motion
18 for Expedited Discovery, and good cause appearing for expedited discovery to allow
19 Firetrace to prepare for the preliminary injunction hearing and to determine the extent of
20 defendants' conduct,

21 IT IS HEREBY ORDERED:

22 1. That defendants will respond to Firetrace's expedited requests for no more than
23 ten categories of documents, pursuant to Fed. R. Civ. P. 34, within three business days of the
24 service of those requests by hand delivery, e-mail or facsimile or within five business days
25 of the service of those requests by U.S. mail;

26 2. Firetrace may take the expedited depositions of defendants Lawrence Jesclard
27 and Candice Jesclard within three business days of the service of notice of deposition by
28 hand-delivery, e-mail or facsimile or within five business days of the service of those

1 requests by U.S. mail. The parties will either stipulate to other necessary expedited
2 depositions or apply to this Court for its approval of other expedited depositions;

3 3. Defendants will not destroy, alter, or dispose of any data, document or other
4 form of evidence that may be relevant to this matter or reasonably calculated to lead to the
5 discovery of admissible evidence; and

6 4. Firetrace will work with defendants to participate in other appropriate and
7 necessary discovery to allow all parties to prepare for the preliminary injunction hearing.

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