IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF ARKANSAS JONESBORO DIVISION

DIANNA HELTON

**PLAINTIFF** 

VS.

NO. 3:08-CV-00054 JMM

SOUTHLAND RACING CORPORATION

DEFENDANT

## PROTECTIVE ORDER

In response to plaintiff's discovery requests, defendant Southland Racing Corporation ("Southland") has agreed to provide counsel for the plaintiff information or documentation on certain past or present employees of Southland for proper use only in this litigation and subject to the affected employees' (whether past or present) privacy rights not being violated or infringed. To protect those privacy rights and the rights of Southland, and because the parties have agreed to the entry of this order, it is therefore:

ORDERED, that the information and documentation on past or present employees provided by Southland shall be used only for proper purposes directly related to the trial of this lawsuit; that any records filed with the Court be redacted to the extent feasible to protect the privacy interests of the past or present employees; that neither the plaintiff, nor anyone acting for or on her behalf shall, in any manner, directly or indirectly, transfer or communicate any of the information and/or documentation obtained to any person except for any necessary and proper purpose directly related to the trial of this action; that any person to whom such necessary communication is made shall be bound by the terms of this Order; that plaintiff's counsel shall provide a copy of this Order to all persons who are in receipt of such necessary

communication; and that at the conclusion of this matter, the plaintiff and her counsel shall return to Southland's attorneys all documents or photocopies of any documents that were supplied to plaintiff and her counsel under this Order.

United States District Judge

Date: 50, 2008

APPROVED AS TO FORM:

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Rv

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