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

PENNY STROUD

PLAINTIFF

VS.

NO. 3:08CV00090-WRW

SOUTHLAND RACING CORPORATION

DEFENDANT

## PROTECTIVE ORDER

In response to plaintiff's discovery requests, defendant Southland Racing Corporation has agreed to disclose to plaintiff's attorney, Marc I. Baretz, certain employment information of defendant's employees other than plaintiff. To protect these defendant's proprietary rights and the privacy rights of its employees whose employment information is disclosed in this case, and because the parties have agreed to the entry of this order, it is therefore:

ORDERED that the information relating to defendant's employees other than plaintiff provided to plaintiff's attorney shall be used only for proper purposes directly related to the trial of this lawsuit; that the information and documentation so provided shall not be in possession of the plaintiff without permission of the Court; that neither the plaintiff nor her attorney, nor anyone acting for or on their behalf shall, in any manner, directly or indirectly, transfer or communicate any of the information or documentation obtained to any person except for any necessary and proper purposes 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; and that plaintiff's counsel shall provide a copy of this Order to all persons who are in receipt of such necessary communication.

790638-v1

Dated this /St day of November, 2008.

UNITED STATES DISTRICT JUDGE

Date: 12

## APPROVED AS TO FORM:

Marc I. Baretz Attorney at Law 110 Thompson Avenue P.O. Box 1107 West Memphis, AR 72303 (870) 732-4102

Fax: (870) 732-4100 Email: marcharetz@aol.com

Ву

Marc I. Baretz

Attorney for Plaintiff Penny Stroud

WRIGHT, LINDSEY & JENNINGS LLP 200 West Capitol Avenue, Suite 2300 Little Rock, Arkansas 72201-3699 (501) 371-0808

Fax: (501) 376-9442 Email: wjackson@wlj.com

mkaemmerling@wlj.com

jkim@wlj.com

Ву

William Stuart Jackson (92189)

Michelle M. Kaemmerling (2001227)

Jane A. Kim (2007160)

Attorneys for Southland Racing Corporation