

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
JONESBORO DIVISION**

**MOHAMMAD RAWAID, d/b/a
QUICK MART (Forrest City) and
QUICK MART (New Albany, Mississippi);
and TWALH, INC. d/b/a A&S QUICK MART**

PLAINTIFFS

v.

CASE NO. 3:10cv00144 BSM

S & S OIL COMPANY, INC.

DEFENDANT

CONSENT PROTECTIVE ORDER

Upon the consent of the parties and consideration of the entire record, a protective order should issue protecting from disclosure certain records of the parties, except as necessary for the prosecution of the pending action.

IT IS, HEREBY, ORDERED that all documents and information produced by plaintiffs or defendant as a result of Rule 26 discovery requests or otherwise and so designated by the producing party as being financial and business records (“protected materials”) are the private business records of the producing party and shall be protected from disclosure except according to the terms of this order. Each party reserves the right to challenge any such designation and request a modification of this consent protective order. The protected materials shall only be disclosed to the following persons, and only for the purpose to prosecute the pending litigation:

- a. The parties, their employees and agents;
- b. Their attorneys of record and persons under the attorney’s direct supervision;

- c. Expert witnesses or consulting experts who agree to be bound by this order; and
- d. Any third party witness in the course of the lawsuit who is to be deposed and who agrees to be bound by the terms of this order.

The parties shall ensure that each person receiving any protected materials under the terms of this order shall agree to be bound by its terms. All protected materials shall be made available to and be used by the parties or the persons authorized to receive the records under the terms of this order solely for preparation for the pending litigation and for no other purpose. The parties agree that the protected materials are secret and confidential records and are entitled to protection. The parties shall take all reasonable precautions to ensure that no persons, other than the persons identified herein as entitled to receive these records, are given access to them.

No longer than thirty days following the conclusion of this action, including any appeal thereof, the parties and their authorized representatives shall destroy all protected materials or return all copies of protected materials to the attorneys for the disclosing party.

IT IS SO ORDERED this 27th day of January, 2011.


UNITED STATES DISTRICT JUDGE