

JAN 04 2011

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

JAMES W. McCORMACK, CLERK
By: *Jackson* DEP. CLERK

ALAN HONARMAND

PLAINTIFF

VS.

NO. 4:07 CV 680 JMM

J.C. PENNEY

DEFENDANT

PROTECTIVE ORDER

In response to plaintiff's discovery requests, J.C. Penney Corporation, Inc. ("J.C. Penney") has agreed to provide counsel for the plaintiff personnel information or documentation on certain past or present employees of J.C. Penney 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 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 J.C. Penney 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 his 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 his counsel shall

return to J.C. Penney's attorneys all documents or photocopies of any documents that were supplied to plaintiff and his counsel under this Order.



U.S. DISTRICT JUDGE

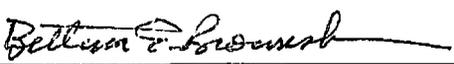
Date: 1-4-11

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