

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

TONI BONE

PLAINTIFF

v.

CASE NO. 4:09-CV-00685BSM

G4S YOUTH SERVICES, LLC,  
MARY STEELE in her  
individual & official capacity,  
VALENCIA PUMPHREY in her  
individual & official capacity,  
ARKANSAS DEPARTMENT OF  
HUMAN SERVICES, and  
TODD SPEIGHT

DEFENDANTS

On this, the 15<sup>th</sup> day of March, 2011, the Court reviewed the stipulation and agreement for a Protective Order, and makes the following Orders:

1. Confidential Information, as later defined herein, and obtained by the Plaintiff from the Defendant in this action, shall be used only for the purpose of this litigation and for no other purpose whatsoever, and shall not be given, shown, made available or communicate in any way to anyone except Qualified Persons, as herein defined.
2. Confidential Information shall be deemed to include, without limitation:
  - (a) Those policies of the company, timesheets, sign-in sheets, personnel files (including, but not limited to social security numbers, dates of birth, medical and financial information), salary history, and information and other matters now requested or hereinafter requested by the Plaintiff, from the Defendant relating to the operation organization of the Defendant and such other information as may be deemed by this court to be relevant or material herein.

(b) Any information concerning such as set forth in 2(a) herein as may be, from time to time, produced by the Defendant to the Plaintiff herein and declared by the Defendant at the time of production to be "Confidential Information" and subject to this Order, such designation to be in writing and may be by letter of transmittal to the Plaintiff.

3. Except with the prior written consent of the Defendant, or pursuant to further Order of this Court on motion with notice to the Defendant, confidential Information may be disclosed to any person other than "Qualified Persons" who shall be defined to include the Plaintiff, any future counsel of record for the Plaintiff in this action, and secretaries, paraprofessional assistance, experts and other employees of such counsel will be actively engaged in assisting counsel in connection with this action, court personnel, witnesses at trial or deposition, and the jury.

4. Upon delivery of Confidential Information to be Plaintiff's counsel herein, the Defendant (or Defendants' counsel) shall execute and submit to Plaintiff's counsel a document entitled "Inventory of Confidential Documents Delivered" in the form affixed hereto as Exhibit 1.

5. This Order, insofar as it restricts the communication in any way and use of Confidential Information, shall continue to be binding through and after the conclusion of this litigation. Three years following the conclusion of this action, including all appeals:

(a) Plaintiff and Plaintiff's counsel shall destroy all confidential information, including, correspondence, memoranda, notes or any other documents embodying such information, in whole or in part.

(b) Counsel and all Qualified Persons are enjoined from disclosing in any manner and Confidential Information obtained during the course of this proceeding.

Severe sanctions will attach to any person who discloses such in violation of this provision.

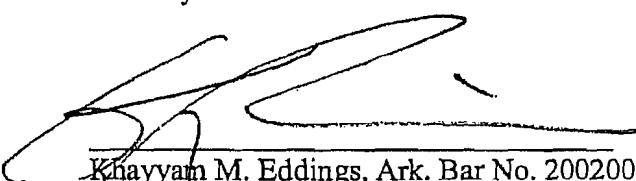
6. Nothing in this Order shall prevent any party from seeking modification of this Order at any time as to specific matters designated "Confidential Information" to remove from the application of this Order.

7. Such Confidential as may be required to be filed with the Court and with the Clerk of this Court shall be filed under seal. Only the Court, Court personnel, and counsel for the parties shall have access to the sealed record in this record proceeding until further Order of this Court.

IT IS HEREBY ORDERED.

  
United States District Judge

APPROVED AS TO FORM:

  
Lucien R. Gillham, Ark. Bar No. 99199  
HARRILL & SUTTER, PLLC  
Attorneys at Law  
P.O. Box 2012  
Benton, AR 72018  
Attorneys for Plaintiff Toni Bone  
Khayyam M. Eddings, Ark. Bar No. 2002008  
Friday, Eldredge & Clark LLP  
2000 Regions Center  
400 West Capitol Avenue  
Little Rock, AR 72201  
Attorney for Defendants G4S Youth Services  
and Todd Speight