

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
WESTERN DISTRICT**

**ASHLEY SALTER, DEBRAH MITCHELL,  
AMANDA BARNETT, SECILLIA RUSSELL,  
COURTNEY COLEMAN, and ELIZABETH  
ANN JUNDT, individually, and on behalf of  
all persons similarly situated**

**PLAINTIFFS**

**vs.**

**Case No. 4:10-CV-906 JLH**

**ONYX CORPORATION d/b/a  
ONYX LABORATORIES, LTD.**

**DEFENDANT**

**PROTECTIVE ORDER**

On this 24<sup>th</sup> day of January, 2011, the Court reviewed the Joint Motion for Protective Order, and makes the following Orders:

1. Confidential Information, as later defined herein, and obtained by the Plaintiffs, Ashley Salter, Debrah Mitchell, Amanda Barnett, Secillia Russell, Courtney Coleman and Elizabeth Ann Jundt, 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 communicated in any way to anyone except Qualified Persons, as herein defined.

2. Confidential Information means:

a. Those personnel and medical files, financial records, applicant data, employment records, records including those reflecting business and/or employment related decisions, grievance files, salary/pay histories, rental records, maintenance records and any and all other documents related to employees and former employees of the defendant.

b. Any information and other matters now requested or hereinafter requested by the Plaintiffs, Ashley Salter, Debrah Mitchell, Amanda Barnett, Secillia Russell, Courtney Coleman and Elizabeth Ann Jundt, from Defendant relating to the operation and organization of Defendant, internal audit documents, external audit documents, financial records, personnel files of employees, salary/pay histories of employees, complaints or grievance files and such other information the confidentiality or privacy of which is protected by statute. Defendant will designate this information as "Confidential Information".

3. Except with the prior written consent of Defendant, or pursuant to further Orders of this Court on motion with notice to Defendant, no Confidential Information may be disclosed to any person other than "Qualified Persons" who shall be defined to include the Plaintiffs, Ashley Salter, Debrah Mitchell, Amanda Barnett, Secillia Russell, Courtney Coleman and Elizabeth Ann Jundt, any future counsel of record for the Plaintiffs, Ashley Salter, Debrah Mitchell, Amanda Barnett, Secillia Russell, Courtney Coleman and Elizabeth Ann Jundt, in this action, and secretaries, paraprofessional assistants, experts, and other employees of such counsel who would be actively engaged in assisting counsel in connection with this action.

4. 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. At the conclusion of this action, including all appeals:

a) Upon request by Defendant, Plaintiffs, Ashley Salter, Debrah Mitchell, Amanda Barnett, Secillia Russell, Courtney Coleman and Elizabeth Ann Jundt (or their counsel, if any,) shall take all reasonable steps necessary to reclaim all

Confidential Information, including correspondence, memoranda, notes or any other documents embodying such information, in whole or in part.

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

5. Such Confidential Information **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, Plaintiffs, Defendant, and their counsel, if any, shall have access to the sealed record in this proceeding until further Order of this Court.


IT IS HEREBY SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

APPROVED AS TO FORM:

/s/ Donna S. Galchus  
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