

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
PINE BLUFF DIVISION

STEPHEN and ROBIN WEARY

PLAINTIFFS

v.

No. 5:09-CV-225 BSM

STRONG MANUFACTURING CO., INC. and  
JOHN DOES 1-5

DEFENDANTS

**STIPULATED PROTECTIVE ORDER**

The parties to this action, as evidenced by the signatures of their attorneys, below, hereby stipulate to the following protective order regarding the production and use of documents containing confidential or competitively sensitive information:

1. Either party may designate a document or series of documents produced during the course of discovery as CONFIDENTIAL. Any copies of documents so designated are to be stamped "CONFIDENTIAL."
2. Any document or series of documents designated CONFIDENTIAL shall be used by the receiving party only for the purposes of this litigation and for no other purpose. All CONFIDENTIAL documents shall be maintained by counsel for the receiving party in a secure place and may be disseminated to others only in accordance with the terms of this protective order.
3. Documents designated "CONFIDENTIAL" may be disseminated by the receiving party only to its attorneys (including the attorneys' secretaries, paralegals and other support staff), expert witnesses, copying services, and those employees and representatives of the receiving party who have a need to know the content of the documents in order to prepare for

trial or to make decisions regarding the future conduct or compromise of the case. No such person shall distribute or disseminate any document designated "CONFIDENTIAL," or any of the content thereof, to any other persons without the prior written consent of the producing party. Any person who receives or reviews documents designated "CONFIDENTIAL" shall be provided with a copy of this protective order and shall sign it on its first page, designating that person's acknowledgement of the protective order's terms and his or her understanding of the obligations imposed.

4. At the conclusion of this litigation, all documents designated CONFIDENTIAL shall be returned to counsel for the receiving party, who shall then contact counsel for the producing party and request instructions regarding the disposition of the CONFIDENTIAL documents. Counsel for the producing party may direct counsel for the receiving party to return the CONFIDENTIAL documents at the producing party's expense, or he may direct that the CONFIDENTIAL documents be destroyed in a mutually agreeable manner. Notwithstanding the foregoing, counsel for the receiving party is entitled to maintain one (1) copy of CONFIDENTIAL documents in his files, for record-keeping purposes.

ENTERED this 26<sup>th</sup> day of October, 2010.

  
UNITED STATES DISTRICT JUDGE

SO STIPULATED:

/s/ Morgan E. Welch

Morgan E. Welch  
Bryce Brewer  
Welch & Kitchens LLC  
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/s/ Theodore A. Schwartz

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By: /s/ Charles L. Schlumberger  
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*Attorneys for Strong Manufacturing Co., Inc.*