

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 14-cv-01456-PAB-KLM

TRACY L. ZUBROD, Trustee for the Bankruptcy Estate of Kellee D. Wertz, also known
as Kellee D. Escobar-Romero,

Plaintiff,

v.

BURRIS COMPANY, INC. a Delaware corporation

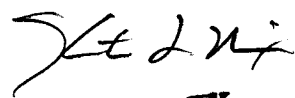
Defendant.

STIPULATED ORDER

The production of privileged or work-product protected documents, electronically stored information ("ESI") or information, whether inadvertently or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Stipulated Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

Nothing contained herein is intended to or shall serve to limit a party's right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness and/or segregation of privileged and/or protected information before production.

So ordered. November 4, 2015


**KRISTEN L. MIX
U.S. MAGISTRATE JUDGE
DISTRICT OF COLORADO**

Submitted this 2nd day of November, 2015.

GRANT & HOFFMAN, P.C.

/s/Brad L. Hoffman

Brad L. Hoffman,

/s/Corey Preston

Corey Preston,

821 9th Street

Greeley, CO 80631

Phone: (970)356-5666

Fax: (970)356-8967

Email: bhoffman@greeleyattorneys.com

cpreston@greeleyattorneys.com

Co-Counsel for Plaintiff

MCNAMARA ROSEMAN & SHECHTER LLP

/s/Todd J. McNamara

Todd J. McNamara

/s/Mathew S. Shechter

Mathew Shechter

1640 East 18th Avenue

Denver, CO 80218

Phone: (303)333-8700

Fax: (303)331-6769

Email: tjm@18thAveLaw.com

mss@18thAveLaw.com

Co-Counsel for Plaintiff

**WITWER, OLDENBURG, BARRY & GROOM,
LLP**

/s/Patrick M. Groom

Patrick M. Groom,

Kent Naughton

822 7th Street, Suite 760

Greeley, CO 80631

Attorneys for Defendant