

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No. 15-cv-00485-WJM-KLM

CLOUDPATH NETWORKS, INC., a Colorado corporation,

Plaintiff,

v.

SECUREW2, INC., a Washington corporation;

JEFFREY GRIMM;

ROGER HANEY;

BHARAT RAM KASHYAP; and

BASZ UNIVERSAL, LLC, a Washington limited liability company,

Defendants.

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**STIPULATED ORDER PURSUANT TO F.R.E. 502(d)**

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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.

Respectfully submitted this 26<sup>th</sup> day of May, 2015.

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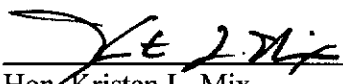
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*Attorneys for Defendant Jeffrey Grimm*

**SO ORDERED**

Dated: May 28, 2015

  
Hon. Kristen L. Mix  
United States Magistrate Judge