

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

Civil Action No.: 1:15-cv-00601-RM-KLM

DAN ELMER, an individual,

PLAINTIFF,

v.

ALL AROUND ROUSTABOUT, LLC, a Colorado limited liability company,  
ALL AROUND TRUCKING, LLC, a Colorado limited liability company,  
RELIABLE FIELD SERVICES, LLC, a Colorado limited liability company, and,  
ACE ENERGY SERVICES, LLC, a Colorado limited liability company,

DEFENDANTS.

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**STIPULATED ORDER REGARDING F.R.E. 502(d)**


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The production of privileged or work-product protected documents, electronically stored information (“ESI”) or other 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.

Dated this 22<sup>nd</sup> day of October, 2015.

BY THE COURT:

  
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Honorable Kristen L. Mix  
United States Magistrate Judge

**APPROVED:**

LOCKE LORD LLP

s/ Ian R. Williams

One of the Attorneys for Defendants

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BECKMAN LAW FIRM, LLC

*Original pleading bearing original signature maintained  
in the offices of Beckman Law Firm, LLC.*

s/ Kate W. Beckman

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