## IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF GEORGIA STATESBORO DIVISION

SAMANTHA WISE,	§
	§
Plaintiff	§
	§
ν.	§
	§
<b>COLLINS MOBILE HOME SALES, INC.,</b>	§
COLLINS HOLDING COMPANY,	§
COLLINS WELL DRILLING and	§
ELI COLLINS, LLC,	§
	§
Defendants	8

CIVIL ACTION NO. 6:14-cv-00069-BAE-GRS

## **CONSENT PROTECTIVE ORDER**

1.

By agreement of the parties, and for good cause, the Court finds that a protective order should be entered pursuant to Rule 26(c), Federal Rules of Civil Procedure for the purpose of protecting commercial and confidential information and trade secrets of defendants.

2.

This protective order shall apply to documentary material provided by the defendants in response to plaintiff's request for production of documents and includes, but is not limited to, balance sheets and other financial information regarding defendants, employee personnel files, employee pay records and other documents relating to the relationships between the defendants.

3.

No document described in Paragraph 2 may be disclosed to any person, except for the following: counsel of record; persons assisting counsel of record, and employees of any party's

attorney to whom it is necessary that the material be disclosed for purposes of this litigation.

4.

Each party agrees that before filing with the Clerk of Court any paper (including, without limitation, an affidavit, memorandum, or motion) that discloses directly or indirectly all or part of any document described in paragraph 2 above, such paper shall be filed under seal and labeled "CONFIDENTIAL".

5.

All such documents produced by defendants to counsel for plaintiff pursuant to paragraph 2 above shall be used only in the course of the above-captioned proceedings and shall not be used or provided for use in any other litigation or proceedings.

## 6.

The documents produced by defendants to counsel for plaintiff pursuant to paragraph 2 above shall not be published, orally, by copy, or by any other means, to any person.

7.

Upon conclusion of this action, counsel for plaintiff shall return to counsel for defendants the original and all copies made of such documents and materials described in paragraph 2 above.

## 8.

After the final termination of this action, the restrictions on communication and disclosure provided for herein shall continue to be binding upon the parties and all other persons to whom documents designated as confidential or information contained therein have been communicated or disclosed pursuant to the provisions of this Order or any other order of this Court.

**SO ORDERED** this  $3\mathcal{W}$  day of December, 2014.

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HON. G. R. SMITH, Magistrate Judge U. S. District Court Southern District of Georgia

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