

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

HARRIETT BECHTLE,		
vs.	Plaintiff,	Case No. 5:12-CV-04013 CM-JPO
CASEY'S GENERAL STORES, INC., d/b/a CASEY'S GENERAL STORE,		
	Defendant.	

STIPULATED PROTECTIVE ORDER

IT IS HEREBY AGREED with respect to any production of information by defendant Casey's General Stores, Inc., or documents sent from defendant Casey's General Stores, Inc. to plaintiff Harriett Bechtle, identified by counsel on behalf of defendant Casey's General Stores, Inc. as CONFIDENTIAL, produced or exchanged through this litigation process, that:

1. Pursuant to FRCP 26(c), this Protective Order is necessary to protect the proprietary information contained within defendant's manuals, parts of which are expected to be discoverable in this litigation, and are protected pursuant to FRCP 26(c)(1)(G) based on the commercial information and trade secrets contained within said manuals.
2. Defendant Casey's General Stores, Inc. has agreed to produce documents requested throughout the discovery process of this litigation, not otherwise subject to privilege or objection, from defendant's manuals which will be marked as CONFIDENTIAL, subject to the Court's acceptance of the provisions of this Protective Order.
3. Any CONFIDENTIAL materials produced from defendant's manuals, pursuant to the rules of discovery, shall be subject to the following restrictions as to plaintiff Harriet Bechtle:
 - a. They shall be used only for the purpose of this litigation and not for any other purposes whatsoever;
 - b. They shall not be given, shown, made available, or communicated in any way to anyone other than (i) the attorneys of record for the parties in this litigation, and

persons in the direct employ of such attorneys, and those other persons to whom the attorneys of record decide it is necessary that the material be shown for purposes of this case, and (ii) the Court and, if the Court permits, the jury in this proceeding;

- c. There shall be no reproduction whatsoever of the material except that, as required in this case, copies, excerpts or summaries may be made, shown or given to those persons authorized by the attorneys of record pursuant to the provisions of paragraph 3(b) above;
- d. Only attorneys of record shall authorize the disclosure of or access to the material to another person.

4. This Protective Order shall prevent any person on behalf of plaintiff Harriet Bechtle, other than an attorney of record or other individual authorized by the attorney of record, from using or producing in any manner whatsoever any CONFIDENTIAL materials from defendant's manuals obtained in this proceeding.

5. All copies, excerpts or extracts of CONFIDENTIAL material from defendant's manuals covered by this Protective Order, except for such material which has become a part of the record in this action, shall be returned by plaintiff's counsel to counsel on behalf of defendant, or destroyed, within thirty (30) days of the final disposition of this action, and defendant may request leave to reopen this litigation for purposes of enforcing this Protective Order if this does not occur.

IT IS SO ORDERED.

Signed this the 20th day of March, 2012.

ENTERED:

/s James P. O'Hara
THE HONORABLE JAMES P. O'HARA

AGREED AS TO THE TERMS AND CONDITIONS:

SUBMITTED AND AGREED:

WENDT GOSS, P.C.

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