

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

|                               |   |                      |
|-------------------------------|---|----------------------|
| ANHEUSER BUSCH, INC.,         | ) |                      |
|                               | ) |                      |
| Plaintiff,                    | ) |                      |
|                               | ) |                      |
| v.                            | ) | No. 4:11-CV-1220-JAR |
|                               | ) |                      |
| NATIONAL UNION FIRE INSURANCE | ) |                      |
| COMPANY OF PITTSBURGH, PA,    | ) |                      |
|                               | ) |                      |
| Defendants.                   | ) |                      |

**MEMORANDUM AND ORDER**

Following a telephone conference with counsel,

**IT IS HEREBY ORDERED** that consistent with the Court’s conference with counsel, National Union’s Motion for Protective Order [89] is **GRANTED** in part and **DENIED** in part as follows:

The deposition of Megan Watt will proceed on December 12, 2012 with the understanding that the scope of Ms. Watt’s deposition will be limited in scope to non-privileged information related to the retained limits policy provision.

The depositions of Jeffrey Goldwater and Carol Johnson shall take place no later than November 30, 2012, with the understanding that the scope of these depositions will be limited to non-privileged information related to the retained limits policy provision..

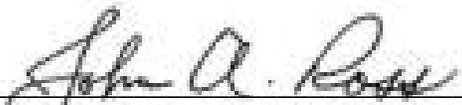
The deposition of Meredith Levy will also proceed with the understanding that the scope of Ms. Levy’s deposition will be limited to non-privileged information related to the retained limits policy provision.

A-B indicated that at this time it is withdrawing the deposition notices for Wayne

Zlotshewer, John Schumacher and John Mohs.

Finally, National Union shall identify and produce witnesses subject to A-B's Rule 30(b)(6) deposition notices no later than December 14, 2012.

Dated this 20th day of November, 2012.

  
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JOHN A. ROSS  
UNITED STATES DISTRICT JUDGE