8:18-cv-00221-MDN Doc # 50 Filed: 06/01/20 Page 1 of 2 - Page ID # 190

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

SANDRA L. EDDY,

Plaintiff,

vs.

BELLEVUE BERRY FARMS, INC., EDWARD A. SCHAEFER A TRUSTEE LIVING TRUST, and DOES 1-5,

Defendants.

8:18CV221

PROTECTIVE ORDER

This matter comes before this Court at the request of the parties in this action.

WHEREAS, Plaintiff is seeking discovery of financial information from the Defendants.

WHEREAS, Defendants contend that such information is confidential and should not be shared outside of this litigation.

WHEREAS, the parties have approved this Order as shown by the signatures indicating approval of the contents of this Order.

IT IS THEREFORE ORDERED AS FOLLOWS:

- 1. The parties agree that any exhibits produced at the Rule 36(b) deposition of a representative of Defendant shall be marked as confidential. Such exhibits will include financial records of any nature representing the financial condition of Defendant and its shareholders and officers. That testimony taken during this deposition will be designated as confidential.
- 2. Such records will be placed under restricted access with the Court for any pretrial proceedings. These records can be used at trial and disclosed to the jury, if otherwise admissible.
- 3. The parties shall be allowed to share such information with any expert witnesses consulted or retained by the parties. The parties shall advise the expert witness of this Order and that such information is to remain confidential.
- 4. The Parties shall not disclose the information described above to any persons or entities who are not involved in this litigation.

8:18-cv-00221-MDN Doc # 50 Filed: 06/01/20 Page 2 of 2 - Page ID # 191

5. Within 30 days of final resolution of this matter (whether by settlement or trial, including any appeals) the parties shall destroy the exhibits.

Dated this 1st day of June, 2020.

BY THE COURT:

s/Michael D. Nelson United States Magistrate Judge

APPROVED AS TO CONTENT AND FORM:

- BY: /s/Raymond R. Aranza, #18523 Raymond R. Aranza, #18523 Richard C. Gordon, #11549 Jonathan M. Brown, #25021 WALENTINE O'TOOLE, LLP 11240 Davenport Street P. O. Box 540125 Omaha, NE 68154 Phone: (402) 330-6300 Fax: (402) 330-6303 Email: raranza@walentineotoole.com dgordon@walentineotoole.com jbrown@walentineotoole.com ATTORNEYS FOR BELLEVUE BERRY FARMS, INC.; EDWARD A. SCHAEFFER A TRUSTEE LIVING TRUST, Defendants
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