

1 Steven T. Densley (NSBN 12951)
 Union Pacific Railroad Company
 2 280 South 400 West, Suite 250
 Salt Lake City, Utah 84101
 3 Ph: (801) 212-3985; Fax: (801) 212-3978
 4 Email: sdensley@up.com
 &
 5 John A. Hunt, Esq. (NSBN 1888)
 Bert Wuester Jr., Esq. (NSBN 5556)
 6 Morris Polich & Purdy, LLP
 500 South Rancho Drive, Suite 17
 7 Las Vegas, Nevada 89106
 8 Ph: (702) 862-8300; Fax (702) 862-8400
 Email: jhunt@mpplaw.com
 9 Email: bwuester@mpplaw.com

10 Co-Attorneys for Union Pacific Railroad Company

11
12 IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA AT
LAS VEGAS, NEVADA

13 GREG GIBBONS,)	
)	
14 Plaintiff,)	Case No.: 2:15-cv-2231
)	STIPULATED PROTECTIVE
15 vs.)	ORDER
)	
16 UNION PACIFIC RAILROAD)	
17 COMPANY, a Delaware Corporation)	
)	
18 Defendant.)	
)	

19
20 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

21 WHEREAS Plaintiff in the above entitled matter have requested that defendant
22 Union Pacific Railroad Company ("Union Pacific") produce to them a copy of the Bridge
23 Inspection Records for Union Pacific's Caliente Sub, MP 474.54 and Engineering
24 Structures Maintenance Field Manual which was in effect on 12/9/2012 and;

25
26 WHEREAS the subject documents contain material that is proprietary in nature
27 that should not be publicly distributed or disseminated;

1 **THEREFORE, IT IS HEREBY STIPULATED** by and between all parties to this
2 action that a Protective Order should be issued by the Court regarding the subject
3 documents as follows:

4 1. The subject documents shall not be disclosed, produced, disseminated or
5 distributed by any party to this action or their attorneys to anyone who is not involved in
6 this case;

7 2. All parties and their attorneys shall not allow the subject documents to be
8 disseminated to, or published on, the internet or any other electronic media at any time
9 for any purpose;

10 3. All parties and their attorneys may provide the subject documents to any
11 of their employees, investigators, consultants, outside experts or other persons for the
12 sole purpose of assisting any or all parties or their attorneys in preparing for trial of this
13 matter. However, to the extent any or all parties or their attorneys provide the subject
14 documents to any of these individuals, said parties and their attorneys agree that they
15 will advise these individuals of this Protective Order and have them sign Exhibit "A"
16 attached hereto, acknowledging the existence of the Protective Order and agreeing to
17 be bound by it. All parties and their attorneys agree that they will not provide to any
18 individual the subject documents before the individual signs Exhibit "A." A signed copy
19 of Exhibit "A" will be promptly provided to Union Pacific each time the subject
20 documents are provided to any other individual. In the case of expert witnesses, a
21 signed copy of Exhibit "A" will be promptly provided to Union Pacific at the time of expert
22 witness disclosure.
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27

1 4. All parties and their attorneys agree that at the conclusion of this case,
2 they will collect any and all copies of the subject documents that may have been
3 provided by them to any other individual and shred each and every copy of the subject
4 documents, and that the obligation to not disclose, produce, disseminate or distribute
5 the subject documents shall continue indefinitely, notwithstanding the case having
6 reached a conclusion.
7

8
9 IT IS SO STIPULATED AND AGREED
10

11
12 Dated: 8/3, 2016

UNION PACIFIC RAILROAD COMPANY
LAW DEPARTMENT

13
14
15 By: 
16 Steven T. Densley (NSBN 12951)
17

18
19
20 Dated: _____, 2016

MORRIS LAW FIRM

21
22 _____
James A. Morris, Jr.
23

24 Dated: _____, 2016

WETHERALL GROUP, LTD.

25
26
27 _____
Peter C. Wetherall

1 4. All parties and their attorneys agree that at the conclusion of this case,
2 they will collect any and all copies of the subject documents that may have been
3 provided by them to any other individual and shred each and every copy of the subject
4 documents, and that the obligation to not disclose, produce, disseminate or distribute
5 the subject documents shall continue indefinitely, notwithstanding the case having
6 reached a conclusion.
7

8
9 IT IS SO STIPULATED AND AGREED

10
11 Dated: _____, 2016

UNION PACIFIC RAILROAD COMPANY
LAW DEPARTMENT

12
13
14 By: _____
15 Steven T. Densley (NSBN 12951)

16
17 Dated: 7/6, 2016

MORRIS LAW FIRM

18 
19 _____
20 James A. Morris, Jr.

21
22
23 Dated: _____, 2016

WETHERALL GROUP, LTD.

24
25 _____
26 Peter C. Wetherall
27

4. All parties and their attorneys agree that at the conclusion of this case, they will collect any and all copies of the subject documents that may have been provided by them to any other individual and shred each and every copy of the subject documents, and that the obligation to not disclose, produce, disseminate or distribute the subject documents shall continue indefinitely, notwithstanding the case having reached a conclusion.

IT IS SO STIPULATED AND AGREED

Dated: _____, 2016

UNION PACIFIC RAILROAD COMPANY
LAW DEPARTMENT

By: _____
Steven T. Densley (NSBN 12951)

Dated: _____, 2016

MORRIS LAW FIRM

James A. Morris, Jr.

Dated: July 5, 2016

WETHERALL GROUP, LTD.

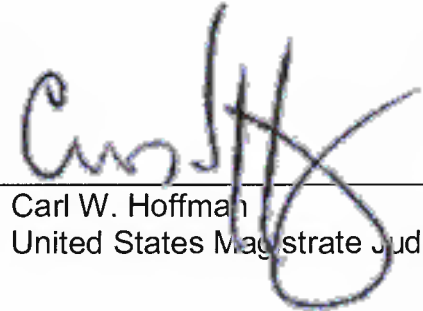
Peter C. Wetherall
Peter C. Wetherall

1 The Court has reviewed the reasons offered in support of entry of this Stipulated
2 Protective Order and finds that there is good cause to protect the confidential nature of
3 certain information. Accordingly, the Court adopts the above Stipulated Protective Order
4 in this action.

5 IT IS SO ORDERED.

6 Dated: August 10, 2016

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Carl W. Hoffman
United States Magistrate Judge

1 CERTIFICATE OF SERVICE

2
3 I hereby certify that on the _____ day of August, 2016, a true, correct and
4 complete copy of the foregoing was served upon the following attorneys in the manner
5 indicated below:

6 James A. Morris, Jr.
7 MORRIS LAW FIRM
8 6310 San Vicente Blvd., Suite 360
9 Los Angeles, CA 90048

- U.S. Mail
- Hand Delivered
- Overnight
- Facsimile
- No Service
- Email
- ECF Service

11 Peter C. Wetherall
12 WETHERALL GROUP, LTD.
13 9345 West Sunset Road, Suite 100
14 Las Vegas, NV 89148

- U.S. Mail
- Hand Delivered
- Overnight
- Facsimile
- No Service
- Email
- ECF Service

17
18 
19 _____