

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

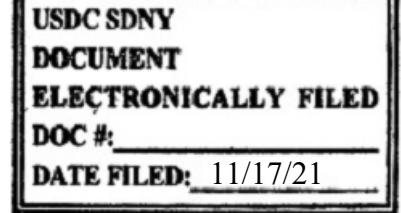
APOLINAR ACEVEDO,

Plaintiff,

-against-

URBAN MANAGEMENT LLC, et al.,

Defendants.



19-CV-9449 (VSB) (BCM)

**DISCOVERY AND
CONFIDENTIALITY ORDER**

BARBARA MOSES, United States Magistrate Judge.

For the reasons discussed at the November 16, 2021 telephonic conference, it is hereby ORDERED that, on or before **November 23, 2021**, plaintiff shall produce his complete federal and state tax returns for tax years 2017 and 2018, including all attached forms and schedules, as well as all documents reflecting payments by plaintiff or his spouse of taxes due and/or refunds issued to plaintiff or his spouse with respect to those tax years.

The parties having advised the Court that there is no confidentiality stipulation currently in effect in this action, and the Court having found that good cause exists for the entry of an appropriately-tailored confidentiality order in light of the sensitive nature of the tax returns and related materials described above (the Tax Documents), it is FURTHER ORDERED that:

1. Neither defendants nor their counsel (nor any other person to whom the Tax Documents may be disclosed pursuant to this Order) shall use the Tax Documents for any purpose other than the evaluation, preparation and litigation of this action.

2. Defendants' counsel of record, to whom the Tax Documents will be produced, shall not further disclose the Tax Documents or their contents to any person other than (a) other attorneys and staff of Tarter Krinsky & Drogin LLP, to whom disclosure is reasonably required for the evaluation, preparation and litigation of this action; (b) defendants (including individual defendant John Schroeder and such officers or employees of defendant Urban Management LLC to whom

disclosure is reasonably required for the purpose of evaluation, preparation and litigation of this action); and (c) the Court, under such conditions as the Court may prescribe. Prior to disclosing the Tax Documents or their contents in any filing in this action, defendants shall provide reasonable notice of the anticipated filing to plaintiff so that plaintiff may, if he wishes, seek a sealing order (or request that defendants seek such an order) in accordance with Moses Ind. Prac. § 3.

3. Upon the conclusion of this action, whether by dismissal, settlement, judgment, or otherwise, defendants and their counsel shall return or destroy all copies of the Tax Documents in their possession, custody, or control, as well as any extracts from or summaries of the Tax Documents (other than materials, if any, already filed on the public docket), and defendants' counsel shall certify in writing that they have done so.

4. Nothing in this Order constitutes or may be interpreted as a ruling concerning the admissibility of the Tax Documents at trial.

5. Nothing in this Order limits plaintiff's use of the Tax Documents.

Dated: New York, New York
November 17, 2021

SO ORDERED.



BARBARA MOSES
United States Magistrate Judge