

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

Kaleigh R. Dittus, Courtney A. Snyder, )  
and Joanna L. Tabler, all individually and on )  
behalf of all other similarly situated )  
individuals, )

Plaintiffs, )

v. )

Case No. 3:14-cv-00300-JFA

K.E.G., Inc., d/b/a Heart Breakers )  
Gentlemen’s Club; Shadow Management )  
Company, Inc., d/b/a Platinum Plus )  
(Columbia); Splash, Inc., d/b/a )  
Platinum Plus (Columbia); Elephant, Inc., )  
d/b/a Platinum Plus (Greenville); )  
KWE Group, LLC; KWON, LLC, d/b/a )  
Platinum West; Gregory Kenwood )  
Gaines a/k/a Ken Wood, and David A. )  
Henson )

Defendants. )

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**RULE 502(d) ORDER**

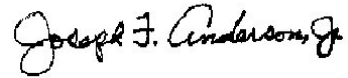
Whereas, the parties to this action (“parties”), have stipulated to the following protective order pursuant to Federal Rule of Evidence 502(d):

1. The production of privileged or work-product protected documents, electronically stored information (“ESI”) or information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).
2. Nothing contained herein is intended to or shall serve to limit a party's right to conduct a review of documents, ESI or information (including metadata) for relevance,

responsiveness and/or segregation of privileged and/or protected information before production.

IT IS SO ORDERED.

May 27, 2014  
Columbia, South Carolina

A handwritten signature in black ink that reads "Joseph F. Anderson, Jr." in a cursive script.

Joseph F. Anderson, Jr.  
United States District Judge