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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

TRADER JOE'S COMPANY, a  
California Corporation,

Plaintiff,

v.

MICHAEL NORMAN HALLATT, an  
individual, d/b/a PIRATE JOE'S a/k/a  
TRANSILVANIA TRADING,

Defendants.

No. 2:13-cv-00768-BJR

**STIPULATED MOTION AND  
ORDER AMENDING PROTECTIVE  
ORDER**

NOTE ON MOTION CALENDAR:  
**May 10, 2017**

**STIPULATION**

WHEREAS on April 12, 2017, Michael Hallatt served a subpoena on World Class Distribution, Inc. ("WCD") requesting a deposition and the production of documents and information containing WCD's sensitive business information (the "Subpoena," a true and correct copy of which is attached hereto as Exhibit A).

WHEREAS this Court entered a Protective Order in the above-captioned action on January 4, 2017 (the "Protective Order," a true and correct copy of which is attached hereto as Exhibit B) to govern the production and dissemination of Confidential Material by the named parties to this action or by any non-party.

1           WHEREAS Trader Joe’s Company (“Trader Joe’s”), Michael Hallatt, and WCD  
2           desire to confirm and clarify the protections afforded to documents and information  
3           produced by WCD in response to the Subpoena under the Protective Order, plaintiff Trader  
4           Joe’s, defendant Michael Hallatt, and third party WCD, by and through their respective  
5           counsel of record, hereby stipulate and request that the Court enter an order thereon as  
6           follows:

7           1.       With respect to the Protective Order, documents and information produced  
8           by WCD in response to the Subpoena will be afforded the same protections as Confidential  
9           Materials produced by Trader Joe’s and Michael Hallatt.

10          2.       In particular, Paragraphs 2 through 10 of the Protective Order will apply in  
11          the same manner to documents and information produced by WCD as they apply to the  
12          parties’ Confidential Materials, including all meet and confer and judicial intervention  
13          provisions.

14  
15                   **IT IS SO STIPULATED.**

16  
17           By /s/ Nathan Alexander  
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              By /s/ Jeremy E. Roller  
              Jeremy E. Roller, WSBA No. 32021

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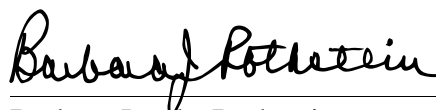
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*Attorneys for Plaintiff Trader Joe's  
Company and Third Party World Class  
Distribution*

**ORDER**

IT IS SO ORDERED.

DATED: May 15, 2017



Barbara Jacobs Rothstein  
U.S. District Court Judge

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this date I electronically filed the foregoing with the Clerk of  
3 the Court using the CM/ECF system, which will send notification of such filing to the  
4 following counsel of record:

5 Nathan T. Alexander (alexander.nathan@dorsey.com)  
6 Michael Keyes (keyes.mike@dorsey.com)  
7 Andrea Yang (yang.andrea@dorsey.com)  
8 DORSEY & WHITNEY LLP

9 *Attorneys for Defendant Michael Norman Hallatt*

10 Dated: May 10, 2017 at Seattle, Washington.

11 *s/Jeremy E. Roller*  
12 \_\_\_\_\_  
13 Jeremy E. Roller