



IN THE DISTRICT COURT IN AND FOR TULSA COUNTY

STATE OF OKLAHOMA

IN RE THE MARRIAGE OF

██████████

PETITIONER,

vs.

██████████

RESPONDENT.

DISTRICT COURT
FILED
DEC 09 2015
SALLY HOWE SMITH COURT CLERK
STATE OF OKLA. TULSA COUNTY

2015 DEC -9 PM 4:07
SALLY HOWE SMITH
COURT CLERK

CASE NO. ██████████
██████████

DISCOVERY PROTECTIVE ORDER

On motion of the parties and on a showing that this Discovery Protective Order is needed to prevent unwarranted disclosure of confidential information, the court orders the following:

1. This Order is entered by consent of the parties by and through their respective counsel of record.
2. This order shall govern all discovery conducted in this case, including the depositions taken by either Petitioner or Respondent and all other discovery conducted herein, including both parties' Answers to Interrogatories and Document Production as requested by the opposing party and all documents or other electronically- stored information, requested pursuant to any third party subpoena duces tecum (all discovery referenced is collectively hereinafter referred to as "Confidential Information").
3. Petitioner and Respondent have agreed to designate all discovery as defined above, in connection with this case, as "CONFIDENTIAL."

4. Such Confidential Information shall be used solely for the purpose of the prosecution or defense of this litigation, and shall not be disclosed in any manner to any person except as provided in this Order.

5. Counsel for the parties hereto shall be responsible for ensuring that access to Confidential Information shall be permitted only to (a.) counsel of record and their employees and agents; their respective clients, and their employees assisting them in this litigation; (b.) outside consultants or experts who are retained to assist the parties in this litigation; (c.) the court, *in camera*, and to its court reporters; (d.) deposition court reporters and their staff; (e.) the actual deposition witnesses and disclosed prospective trial witnesses to the extent the Confidential Information may reasonably be believed to relate to their testimony; and, (f.) others permitted by order of the court. No person having access to any Confidential Information shall disclose in any manner its contents to any person other than those described in this paragraph. No such disclosure shall be made for any purpose other than those specified in this order.

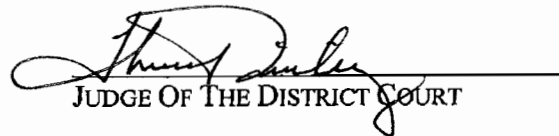
6. Disclosure to any person specified in paragraph 5(b.) and (e.) shall be permitted only after each such person is made aware of this Order and understands and agrees to be bound by the terms herein. Such agreement shall be obtained by securing the signature of any recipient of Confidential Information on a copy of this Order. Counsel disclosing Confidential Information to such person shall be responsible for maintaining a file containing the signatures of all such persons to whom Confidential Information has been disclosed. The file shall be made available to opposing counsel after trial and at the termination of this litigation or earlier by agreement of the parties or by order of the court for cause shown.

7. No Confidential Information, including briefs or other papers containing reference to Confidential Information, shall be filed except under seal with the legend "THIS DOCUMENT CONTAINS CONFIDENTIAL INFORMATION AND IS SUBJECT TO A PROTECTIVE ORDER OF THE COURT."

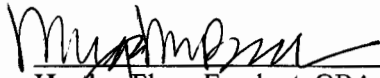
8. A waiver of any of the terms of this order will not be effective absent the written consent of both parties. Nothing in this order shall prevent a party from seeking additional protection as to information deemed confidential.

9. The provisions of this order as to confidentiality shall not terminate with the disposition of this action, but shall continue until further order of this court or a Court of any other jurisdiction or by written agreement of the parties as to its termination.

AND IT IS SO ORDERED.


JUDGE OF THE DISTRICT COURT

APPROVED AS TO FORM AND CONTENT:



Heather Flynn Earnhart, OBA No. 19456

Bryan J. Nowlin, OBA No. 21310

Megan M. Beck, OBA No. 30962

HALL, ESTILL, HARDWICK, GABLE,

GOLDEN & NELSON, PC

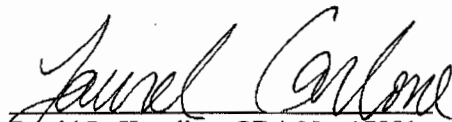
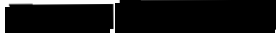
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