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**IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA**

2016 AUG 15 PM 4:17
SALLY HOWE SMITH
COURT CLERK
DISTRICT COURT
FILED
AUG 15 2016
SALLY HOWE SMITH
STATE OF OKLA TULSA COUNTY

In re the Marriage of:

[Redacted]

Petitioner,

and

[Redacted]

Respondent.

Case No. [Redacted]

**STIPULATION AND PROTECTIVE ORDER FOR
CONFIDENTIALITY OF DISCOVERY MATERIALS**

It is stipulated by attorneys for Petitioner and attorneys for Respondent, and subject to the approval of the Court, that:

1. Petitioner has served Respondent with Request for Production of Documents and propounded Interrogatories to Respondent. Petitioner seeks the production of certain documents and request information that may contain confidential and privileged information of the Respondent.

2. The purpose of this Stipulation and Protective Order for Confidentiality of Discovery Materials is to (i) ensure that the information, materials and documents requested are made available to Petitioner, and Petitioner's counsel and (ii) the confidential materials, information and documents of the Respondent are only provided to Petitioner and Petitioner's counsel, and certain specifically enumerated parties whose possession and review of said confidential materials, information and documents are necessary.

3. The information, materials and documents requested, if made public, may cause the Respondent irreparable harm because (i) the requested materials and documents contain confidential, sensitive information pertaining to Respondent's confidential business ventures,

activities, and financial information pertaining thereto, or (ii) contains information that is required by law or contract to keep confidential.

4. Pursuant to this stipulation, all requested materials, information and documents produced by the Respondent shall not be filed in this action unless the Court orders otherwise and said materials, information or documents are used in connection with a motion or at a hearing related to this proceeding or are filed under seal.

5. The Respondent may designate as "confidential" all or any part of the requested materials, information or documents produced in response to the served discovery requests. When designating any of the requested materials, information or documents as "confidential", the Respondent represent that said materials, information or documents are confidential and subject to protection in accordance with federal and state law.

6. The designation shall be made with respect to the requested materials, information or documents by marking the word "CONFIDENTIAL" on them before they are produced. Materials, information and documents designated as confidential shall at all times be kept in the possession of attorneys for the parties or the persons specified in paragraph 10 hereof. All the above-described documents received by and through any legal process or voluntary submission by the Respondent shall be segregated in the party's file who has possession of the same and shall be marked as "Confidential Records" so as to ensure their disclosure shall not be inadvertently made.

7. Legal counsel for Petitioner or the persons specified in paragraph 10 hereof shall not disclose any confidential materials, information or documents or use any confidential

materials, information or documents provided by the Respondent in any manner other than in connection with this action.

8. The Respondent may further designate as "for attorneys eyes only" all or any part of the requested materials, information or documents produced by the Respondent.

9. Materials designated for attorneys eyes only shall not be disclosed without further Order of this court to any other person or entity except counsel for the Petitioner.

10. Confidential materials, information or documents produced by the Respondent, in connection with this action shall not be disclosed to any other person or entity except as follows:

1. The parties to this action;
2. To legal counsel to the parties to this action; and,
3. Employees of said legal counsel.

11. Any person, besides legal counsel for Petitioner and employees of legal counsel for Petitioner, to whom confidential materials, information or documents are disclosed shall sign a copy of this Stipulation and Protective Order to acknowledge that he or she has read, understands, and agrees to be bound by its terms. Before disclosing confidential materials, information or documents to any person other than an employee of legal counsel for Petitioner assisting in this action, legal counsel for Petitioner shall secure the signature of such person on a copy of this Stipulation and Protective Order, and legal counsel for Petitioner shall retain the signed copy pending further Order of this Court or final disposition of this action. Any additional signatures to the Stipulation and Protective Order must be provided to Respondent's legal counsel.

12. If legal counsel for either party intends to present or make reference to confidential materials, information or documents to the Court, included in, attached to, or discussed in briefs, memoranda or other documents filed with the Court or as exhibits in a hearing, which are not filed under seal, legal counsel for any party shall give legal counsel for Respondent written notice at least twenty (20) days before the briefs, memoranda or other papers are filed with the Court at the following address:

Michael James King
Winters & King, Inc.
2448 East 81st Street, Suite 5900
Tulsa, OK 74137

Copies of the confidential materials, information or documents shall be attached to the notice, but the notice shall not be filed with the Court, unless filed under seal.

13. If legal counsel for Petitioner objects to a designation of materials, information or documents as confidential or attorneys eyes only, counsel shall serve written notice on the legal counsel for Respondent, setting forth the basis of the objection. The legal counsel for Respondent shall respond in writing within ten (10) days after service of the notice by either (a) withdrawing the designation of confidentiality or attorneys eyes only, or (b) refusing to withdraw the designation of confidentiality or attorneys eyes only and stating the basis for such refusal. If the legal counsel for Respondent fails to respond within ten (10) days, the designation of confidentiality or attorneys eyes only shall be deemed withdrawn. If the legal counsel for Respondent refuses to withdraw the designation, counsel for all interested parties shall meet and confer, either in person or by telephone, to attempt in good faith to resolve the dispute. If the dispute cannot be resolved, legal counsel for the objecting party may file a timely motion with the Court to remove the designation of confidentiality or attorneys eyes only after such meeting.

At the hearing on the motion to remove the designation of confidentiality or attorneys eyes only, the legal counsel for Respondent, shall bear the burden of establishing that the designated materials, information or documents are confidential. Until the Court renders its decision, the materials, information or documents shall remain confidential in accordance with this Stipulation and Protective Order.

14. This Protective Order does not limit the rights of any parties to assert claims of privilege and confidentiality during the remainder of any proceedings herein.

15. Any party who receives from a non-party a Subpoena or other process purporting to require disclosure of the above-described confidential information, shall immediately provide notice to all other parties and to Respondent and his legal counsel. No disclosure of the above-described confidential information shall be made pursuant to any such Subpoena without written permission of counsel for the Respondent or an order of this Court authorizing said disclosure.

16. The provisions of this Stipulation and Protective Order shall continue in effect after the conclusion of this action. At the conclusion of this action, all confidential materials information and documents including attorneys eyes only information or documents (and signed copies thereof) which are in possession of Petitioner, her counsel, or their agents or employees shall be delivered to the legal counsel for the Respondent, Michael James King at Winters and King, Inc., 2448 East 81st Street, Suite 5900, Tulsa, OK 74137-4259, 918-494-6868.

Dated: _____

Respectfully submitted,



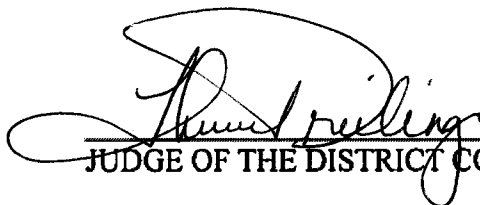
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Attorneys for Respondent

Upon a finding of good cause, IT IS SO ORDERED.

Dated: Aug. 11, 2016



JUDGE OF THE DISTRICT COURT