

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS**

EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION and BROOKE SONNTAG

Plaintiffs,

v.

Civil Action No. 06-2412-JWL-DJW

THORMAN & WRIGHT CORP., ET AL.

Defendants.

**STIPULATION FOR THE PROTECTION AND  
EXCHANGE OF CONFIDENTIAL INFORMATION**

The parties to the above action hereby agree:

**NOW** on this 21<sup>st</sup> day of June, 2007, it is hereby ordered as follows:

1. This Order shall apply to the Simplex Grinnell Severance Agreement (hereinafter "Confidential Materials") produced by Plaintiffs pursuant to the Court's Order of June 5, 2007, to which the producing party asserts a claim of confidentiality.
2. From the date of this Order forward, the parties shall mark any Confidential Materials with appropriate language or stamps, such as "Confidential."
3. Confidential Materials shall be disclosed to and viewed by only the receiving parties, their counsel of record, paralegals, assistants, secretaries, and deposition or trial witnesses ("Authorized Persons") and only in connection with the above-captioned litigation, as described herein. Such Authorized Persons may work with representatives of Simplex Grinnell regarding the Confidential Materials in connection with this litigation. The parties and their counsel agree that they shall not disclose, shall not permit others to disclose and shall take prudent steps to prevent disclosure of Confidential Materials to unauthorized persons.



4. Unless leave of the Court, if any, or consent of the producing party is first obtained as outlined above, Confidential Materials shall be used by the receiving party solely in connection with the above-captioned litigation, including appeals.

IT IS SO ORDERED.

Dated in Kansas City, Kansas on this 21<sup>st</sup> day of June, 2007.

s/ David J. Waxse  
David J. Waxse  
United States Magistrate Judge

cc: All counsel and *pro se* parties



Submitted by,

/s/ Andrea G. Baran

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