

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

MIKE RANDOLPH,

Plaintiff,

vs.

Case No. 6:16-cv-01063

QUIKTRIP CORPORATION,

Defendant.

PROTECTIVE ORDER

As reflected by the signature of counsel below, the parties have agreed to this Protective Order. Accordingly, the Court being sufficiently advised;

It is hereby ORDERED that:

1) Plaintiff and plaintiff's counsel will not give, show or otherwise divulge any of the documents, videos or other materials produced by QuikTrip Corporation in this action which are claimed to be confidential by QuikTrip Corporation and stamped accordingly or any testimony relating thereto, to any entity or person except plaintiff or plaintiff's counsel in this specific lawsuit.

2) Plaintiff and plaintiff's counsel will not give, show or otherwise divulge the substance of the documents, video or other materials produced by QuikTrip Corporation in this action, to any entity or person except the experts and consultants employed by plaintiff or plaintiff's counsel in this specific lawsuit.

3) Plaintiff, her counsel and experts will use the documents or other materials produced by QuikTrip Corporation and claimed to be confidential only in connection with this action.

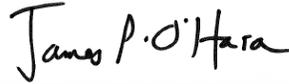
4) Plaintiff's counsel shall present their experts and consultants with a copy of the Protective Order and instruct them not to give, show or otherwise divulge any of the documents, videos or other materials produced by QuikTrip Corporation in this action which are claimed to be confidential by QuikTrip Corporation and stamped accordingly, or any copies, prints, negatives, or summaries thereof to any entity or person except those employed by plaintiff or plaintiff's counsel in this specific lawsuit. Any experts and consultants to whom documents or other materials produced by QuikTrip Corporation are given, shown or otherwise divulged shall return all such documents or other materials, or any copies, prints, negatives, notes, indices or summaries thereof to plaintiff's counsel upon completion of the trial and any appeals in this action and the satisfaction of any judgment or upon the conclusion of any settlement or dismissal in this action.

5) The plaintiff's experts and consultants shall be advised by said counsel that he or she is bound by the terms of this Order and shall execute a copy of the Protective Order which certifies that he or she is so bound by those terms prior to the disclosure of the documents or information to such experts or consultants. Counsel for QuikTrip Corporation shall be provided with a copy of each such executed Order at the conclusion of this litigation.

6) This Protective Order shall apply to documents, videos or other material claimed to be confidential and marked accordingly that appear as testimony or exhibits in deposition transcripts as taken in this action to preserve the confidentiality of that information.

7) Upon completion of the trial and any appeals in this action and the satisfaction of any judgment or upon the conclusion of any settlement or dismissal in this action, a copy of the documents, videos or other materials claimed to be confidential and stamped accordingly shall be filed under seal with the Court to protect and preserve the interests of all parties. Plaintiff, her

counsel, experts and consultants shall return all documents, videos, materials or information claimed to be confidential to counsel for QuikTrip Corporation, along with any and all copies, prints, negatives, or testimony relating thereto.



~~DISTRICT COURT JUDGE~~

James P. O'Hara
U.S. Magistrate Judge

APPROVED:

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