IN THE CIRCUIT COURT OF CLINTON COUNTY

MICHAEL O'LOUGHLIN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 08CN-CV00705
	)	
PRIME TANNING CORP., et al.,	)	
	)	
Defendants.	)	

FILED
JAN 22 2010
MOLLY LIVINGSTON
CLERK OF CIRCUIT COURT

NATIONAL BEEF LEATHERS, LLC's UNOPPOSED MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Defendant National Beef Leathers, LLC ("NBL"), hereby moves the Court to enter a protective order relating to the handling of confidential business information ("CBI") that is likely to be contained in discovery materials generated or produced in the course of this litigation. A form of the protective order sought by this motion is attached as Exhibit A hereto.

The grounds for this motion are as follows:

1. The parties agree that CBI is likely to be contained in discovery materials generated or produced in the course of this litigation, that the parties are likely to have a need for access to such information in the course of the litigation, and that the parties producing or otherwise having confidential business interests in such information are entitled to protection from its disclosure beyond the extent necessary for its appropriate use in the course of this litigation.

2. The parties have agreed that the entry of a protective order in the form of Exhibit A hereto is necessary and appropriate to satisfy the parties' various interests in CBI that is likely

to be generated or produced in the course of this litigation and therefore agree that NBL's motion for the entry of such protective order should be granted.

3. Counsel for NBL has advised counsel for all other parties of NBL's intention to file this motion, and NBL's counsel has been advised by counsel for all other parties that no other party has any objection to this motion or to the entry of the protective order sought hereby.

WHEREFORE, Defendant NBL respectfully requests the Court to grant this motion, to enter a protective order in the form of Exhibit A hereto, and to grant it all further appropriate relief.

Date: January 21, 2010

Respectfully submitted,

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