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U.S. DISTRICT COURT

Moore & Myers
Joseph F. Moore, Jr.
R. Scott Garland
P. O. Box 8498
Jackson, WY 83002
(307) 733-8668
(307) 733-3220
Attorneys for Plaintiffs

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

RICHARD D. COLLARD and MOUNTAIN)
STATES CONSULTING, LLC, a)
Wyoming Limited Liability Co.)
)
Plaintiffs,)
)
vs.) Case No. 2:01-CV-0008-B
)
RONALD KAILEY, and TRIBAL)
SOFTWARE, INC., a Wyoming)
Corporation; and John Does 1 through 3,)
)
Defendants.)
)

STIPULATED MOTION FOR PROTECTIVE ORDER

COMES NOW Plaintiffs and Defendants, by and through their counsel of record, and hereby jointly move the Court for an order limiting the dissemination of confidential and proprietary information in this litigation. In support of this Motion, Plaintiffs and Defendants state as follows:

1. This litigation involves questions of alleged computer software copyright violations which will necessarily require the parties to make comparisons of each other's computer software and other information including, but not necessarily limited to software installation and user guide manuals, license agreements, hard

copy printouts of software codes, and notes and memoranda about software code content and development.

2. The software and other information which will necessarily need to be exchanged contains confidential and proprietary trade secrets that, if released without restrictions, likely would damage the competitive advantages and capabilities of each party.
3. Rule 26(c) of the Federal Rules of Civil Procedure allows the Court to enter a protective order when justice requires in order to protect a party or person from annoyance, embarrassment, oppression or undue burden or expense.
4. The parties have conferred in good faith and have come to an agreement as to an appropriate protective order to limit and guide the release of confidential and proprietary information in this litigation. A copy of the Plaintiffs' and Defendants' proposed protective order is attached hereto for the Court's review

WHEREFORE, Plaintiff and Defendants move for the entry of a protective order and request that this Court (a) grant this motion and (2) enter a protective order such as that which is attached hereto.

DATED this 7 day of June, 2001.



R. Scott Garland
Moore & Myers
P. O. Box 8498
Jackson, WY 83002
(307) 733-8668
(307) 733-3220 Fax
Attorneys for Plaintiffs



Robert T. McCue
Ian D. Shaw
Hathaway Speight & Kunz, LLC
P. O. Box 1208
Cheyenne, WY 82001-1208
(307) 634-7723
(307) 634-0985 Fax
Attorneys for Defendants