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IN THE CIRCUIT COURT OF HARRISON COUNTY, WEST VIRGINIA  
BUSINESS COURT DIVISION

RONALD LANE, INC., a West Virginia  
Corporation, CHRISTOPHER LANE,  
and NORMAN LANE,

Plaintiffs,

Civil Action No. 21-C-12-2 Harrison  
The Honorable Michael D. Lorensen,  
Presiding Judge

v.

RONALD LANE,

Defendant,

And

RONALD LANE,

Plaintiff,

v.

Civil Action no. 21-C-60 Kanawha  
The Honorable Michael D. Lorensen,  
Presiding Judge

CHRISTOPHER LANE, NORMAN  
LANE, and RONALD LANE, INC., a  
West Virginia limited liability corporation,

Defendants.

PROTECTIVE ORDER

By signing this Protective Order, the parties have agreed to be bound by its terms  
and to request its entry by the presiding judge. It is hereby ORDERED as follows:

I. DISCOVERY PHASE.

A. If a party or an attorney for a party has a good faith belief that certain  
documents or other materials (including digital information) subject to disclosure  
pursuant to a discovery or other request, are confidential and should not be disclosed

other than in connection with this action and pursuant to this Protective Order, the party or attorney shall mark each such document or other material as "CONFIDENTIAL."

B. If a party or an attorney for a party disputes whether a document or other material should be marked "CONFIDENTIAL," the parties and/or attorneys shall attempt to resolve the dispute between themselves. If they are unsuccessful, the party or attorney challenging the "CONFIDENTIAL" designation shall do so by filing an appropriate motion.

C. No party or attorney or other person subject to this Protective Order shall distribute, transmit, or otherwise divulge any document or other material which is marked "CONFIDENTIAL," or the contents thereof, except in accordance with this Protective Order. Court personnel are not subject to this Protective Order while engaged in the performance of their official duties.

D. Any document or other material which is marked "CONFIDENTIAL," or the contents thereof, may be used by a party, or a party's attorney, expert witness, consultant, or other person to whom disclosure is made, only for the purpose of this action. Nothing contained in this Protective Order shall prevent the use of any document or other material which is marked "CONFIDENTIAL," or the contents thereof, at any discovery deposition taken in this action.

E. If a party or attorney wishes to disclose any document or other material which is marked "CONFIDENTIAL," or the contents thereof, to any person actively engaged in working on this action (e.g., expert witness, paralegal, associate, consultant), the person making the disclosure shall do the following:

1. Provide a copy of this Protective Order to the person to whom disclosure is made;
2. Inform the person to whom disclosure is made that s/he is bound by this Protective Order;
3. Require the person to whom disclosure is made to sign an acknowledgment and receipt of this Protective Order;
4. Instruct the person to whom disclosure is made to return any document or other material which is marked "CONFIDENTIAL," at the conclusion of the case, including notes or memoranda made from "CONFIDENTIAL" material;
5. Maintain a list of persons to whom disclosure was made and the "CONFIDENTIAL" materials which were disclosed to that person; and
6. At the conclusion of the action, gather the "CONFIDENTIAL" materials, copies thereof, and related notes and memoranda, and return them to the party or attorney who originally disclosed them, with a certificate of compliance with the terms of this Protective Order.

## II. POST-DISCOVERY PHASE

If any party or attorney wishes to file, or use as an exhibit or as evidence at a hearing or trial, any "CONFIDENTIAL" document or material, the party must provide reasonable notice to the party that produced the document or material. The parties and/or attorneys shall then attempt to resolve the matter of continued confidentiality by either (a)

removing the “CONFIDENTIAL” marking, or (b) creating a mutually acceptable redacted version that suffices for purposes of the case. If an amicable resolution proves unsuccessful, the parties and/or attorneys may present the issue to the court for resolution.

### III. FILING UNDER SEAL

The Court anticipates that the parties will be making various filings (including motions and legal memoranda) that may cite, quote, incorporate, attach, and/or rely on protected materials that are marked “Confidential.” Accordingly, the Court hereby directs that in the event a filing cites, quotes, incorporates, attaches, or relies upon protected materials that are marked “Confidential,” the party shall designate the filing using a header stating **“FILED UNDER SEAL,”** and the clerk shall file any document containing such header **UNDER SEAL.**

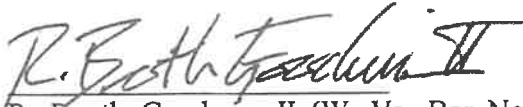
Dated this 31<sup>st</sup> day of August 2021.



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Hon. Michael D. Lorensen  
Presiding Judge

Prepared and submitted by:



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STATE OF WEST VIRGINIA

COUNTY OF HARRISON, TO-WIT

I, Albert F. Marano, Clerk of the Fifteenth Judicial Circuit and the 18<sup>th</sup> Family Court Circuit of Harrison County, West Virginia, hereby certify the foregoing to be a true copy of the ORDER entered in the above styled action on the 31<sup>st</sup> day of August, 2021.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the

Seal of the Court this 1<sup>st</sup> day of September, 2021.

Albert F. Marano  
mr

Fifteenth Judicial Circuit & 18<sup>th</sup>

Family Court Circuit Clerk

Harrison County, West Virginia