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IN THE TWENTY-FIRST JUDICIAL CIRCUIT COURT OF
ST. LOUIS COUNTY, STATE OF MISSOURI

MATTHEW J. WEISS,	)	
Petitioner,	)	
	)	
vs.	)	Cause No.: 22SL-DR02534
	)	Division: 33
MARY WEISS,	)	
	)	
Respondent.	)	

CONSENT PROTECTIVE ORDER RE: BUSINESS RECORDS OF WEISS INSURANCE AGENCY INCORPORATED

This Order is entered this 8th day of ~~October~~ November, 2023 ("PROTECTIVE ORDER") by consent of Petitioner, Matthew J. Weiss, and Respondent, Mary Weiss.

WHEREAS, there is a dissolution of marriage action that is pending before this court.

WHEREAS, Respondent has served upon WEISS INSURANCE AGENCY INCORPORATED a Subpoena Duces Tecum and a Notice of Deposition requesting the following documents and things for the period of January 1, 2022 until the present:

1. All contracts with insurance producers;
2. All contracts with any entity or person concerning or evidencing any claim or interest in Weiss Insurance Agency Incorporated or any of its assets;
3. All documents not otherwise produced in response to request no. 2 concerning or evidencing any claim against Weiss Insurance Agency Incorporated;
4. Income statements;
5. Profit and loss statements;
6. General ledgers; and
7. Payroll registers and reports.

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NOW, THEREFORE, in consideration of the premises, this court orders:

1. The documents produced by WEISS INSURANCE AGENCY INCORPORATED pursuant to Respondent's subpoena shall be referred to in this order as "CONFIDENTIAL INFORMATION."

2. Both parties may be given the CONFIDENTIAL INFORMATION. The parties shall not discuss, or disseminate (in any manner or medium) any CONFIDENTIAL INFORMATION with any person *except* the parties may discuss said CONFIDENTIAL INFORMATION with their counsel (including their counsel's employees, agents, and consultants, or any experts in the pending litigation or future counsel of record.

3. The CONFIDENTIAL INFORMATION shall be used solely for the preparation and litigation of this action, including any appeals therefrom. The parties may offer the CONFIDENTIAL INFORMATION in evidence in any trial or evidentiary hearing and may discuss its contents in that setting.

4. Respondent shall not contact any vendors, producers, employees, agents, or independent contractors of WEISS INSURANCE AGENCY INCORPORATED regarding the CONFIDENTIAL INFORMATION.

5. This PROTECTIVE ORDER shall have no bearing on the issue of evidentiary admissibility of the CONFIDENTIAL INFORMATION produced.

6. After this matter is concluded (including post-trial motions and appeals), this protective order shall be included by the parties as part of any final Judgment.

7. The Court shall retain jurisdiction with respect to this PROTECTIVE ORDER for the purpose of enforcing its terms and conditions and to enable any party herein affected to apply

for such other and further orders including but not limited to SANCTIONS for failure to comply concerning the subject of this PROTECTIVE ORDER as may be necessary or appropriate.

Attorney for Petitioner

Attorney for Respondent

SO ORDERED:

Judge Michael Burton, Special Master

Dated: 11 / 8 / 23

Not an Official Court Document

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