

STATE OF SOUTH CAROLINA  
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS

Civil Action No.: 2017-CP-07-01739

MARK SHAFFER, as personal representative )  
of the Estate of SUSAN SHAFFER, )  
Deceased, )

Plaintiff )

v. )  
DEH DISASTER RECOVERY, LLC; )  
CERES ENVIRONMENTAL SERVICES, )  
INC.; BEAUFORT COUNTY, A )  
POLITICAL SUBDIVISION OF THE )  
STATE OF SOUTH CAROLINA; RYAN )  
COLTER STOLTZ; MATT T. DOTSON; )  
TIM TOD DOTSON; BRANDI DOTSON; )  
DOTSON & SON LOGGING, INC.; )  
SPENCER A. OLSON TRUCKING, LLC; )  
BUYERS PRODUCTS, CO.; TRUCKPRO, )  
LLC; and ST SALES, LLC; )

Defendants. )

**CONSENT MOTION FOR ENTRY OF  
STIPULATED PROTECTIVE ORDER**

Defendants Buyers Products, Co., (hereinafter “Buyers”) and TruckPro, LLC, (hereinafter “TruckPro”) by and through their undersigned attorneys, hereby move this Court to enter the Stipulated Protective Order attached as **EXHIBIT 1**. In support of this motion, Buyers and TruckPro state as follows:

1. This matter will require significant discovery, much of which may require the disclosure of trade secrets or other confidential information.
2. It is in the best interests of the parties to have an order that protects the disclosure of information exchanged during the discovery process.
3. Each party has indicated to undersigned counsel that they stipulate to the entry of the protective order.

Accordingly, Buyers and TruckPro respectfully request this Court sign and enter into the record the attached Stipulate Protective Order.

Respectfully submitted  
this 7<sup>th</sup> day of May, 2018

s/Russell M. Racine  
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**CERTIFICATE OF SERVICE**

I do hereby certify that on today's date I have served a copy of the foregoing on the attorneys through the ECF filing system.

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