

**Lisa A. Wafer**

**From:** Lisa A. Wafer [lwafer@ferronlaw.com]  
**Sent:** Monday, July 24, 2006 3:15 PM  
**To:** 'Christina Marshall'  
**Subject:** John W. Ferron v. VC E-Commerce Solutions, Inc., et al.  
**Attachments:** Ferron VC Proposed Stipulated Protective Order 7-24-06.doc

Christina:

I have spoken with the person responsible for our technology today, and I have confirmed that we will be able to produce copies of all of Mr. Ferron's "junk email" on or before the August 4, 2006 deadline set by Magistrate Judge Abel.

As the parties begin to exchange information in this case, both informally and by way of formal discovery, I anticipate that there will be certain information provided by both Plaintiff and Defendants, which will be confidential and/or proprietary in nature. In that regard, I have prepared a proposed Stipulated Protective Order for your input and approval.

I'd like to get this finalized before producing copies of Mr. Ferron's emails as he plans to designate them as "confidential". Due to the nature of some of the email contained within the file we will be producing, Mr. Ferron objects to their being filed publicly with the Court.

Should you have any questions or comments, please do not hesitate to contact me. Otherwise, I look forward to hearing favorably from you soon regarding the attached proposed Stipulated Protective Order.

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Thank you.