


STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF CHARLESTON )  
 )  
 Kylie Erickson, )  
 )  
 \_\_\_\_\_ )  
 Plaintiff, )  
 vs. )  
 )  
 James Ventures, LLC d/b/a Loggerheads Beach )  
 Grill, and Jenna Mattox, )  
 \_\_\_\_\_ )  
 Defendants. )

IN THE COURT OF COMMON PLEAS  
NINTH JUDICIAL CIRCUIT  
 CASE NO.: 2018-CP-10-05822

**MOTION AND ORDER INFORMATION  
 FORM AND COVERSHEET**

Plaintiff's Attorney: <u>Christopher T. Dorsel</u> Bar No. _____ Address: <u>Senn Legal, LLC</u> <u>3 Wesley Drive, Charleston, SC 29422</u> Phone: <u>(843) 556-4045</u> Fax <u>(843) 556-4046</u> E-mail: <u>chris@sennlegal.com</u> Other: _____	Defendant's Attorney: <u>Brandon S. Cabot</u> Bar No. 103554 Address: <u>Rogers, Townsend &amp; Thomas, PC</u> <u>177 Meeting Street, Suite 320, Charleston, SC 29401</u> Phone: <u>(843)737-8612</u> Fax <u>(843)737-8584</u> E-mail: <u>brandon.cabot@rtt-law.com</u> Other: _____
<input type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input checked="" type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)	
<b>SECTION I: Hearing Information</b>	
Nature of Motion: _____ Estimated Time Needed: _____ Court Reporter Needed: <input type="checkbox"/> YES/ <input type="checkbox"/> NO	
<b>SECTION II: Motion/Order Type</b>	
<input type="checkbox"/> Written motion attached <input checked="" type="checkbox"/> Form Motion/Order: <b>Consent Protective Order</b> I hereby move for relief or action by the court as set forth in the attached proposed order.	
 Signature of Attorney for <input type="checkbox"/> Plaintiff / <input checked="" type="checkbox"/> Defendant	<u>3/26/19</u> Date submitted
<b>SECTION III: Motion Fee</b>	
<input checked="" type="checkbox"/> PAID – AMOUNT: \$ <u>25.00</u> <input type="checkbox"/> EXEMPT: (check reason)	
<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support <input type="checkbox"/> Domestic Abuse or Abuse and Neglect <input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party <input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief <input type="checkbox"/> Motion for Stay in Bankruptcy <input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRCF) <input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions Name of Court Reporter: _____ <input type="checkbox"/> Other: _____	
<b>JUDGE'S SECTION</b>	
<input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____	JUDGE CODE _____ Date: _____

**CLERK'S VERIFICATION**

Collected by: \_\_\_\_\_ Date Filed: \_\_\_\_\_

MOTION FEE COLLECTED: \$ \_\_\_\_\_

CONTESTED – AMOUNT DUE: \$ \_\_\_\_\_

SCCA 233 (11/2003)

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
COUNTY OF CHARLESTON ) CIVIL ACTION NO.: 2018-CP-10-05822

Kylie Erickson, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
James Ventures, LLC d/b/a Loggerheads )  
Beach Grill, and Jenna Mattox, )  
 )  
Defendants. )

**CONSENT PROTECTIVE ORDER**

2019 MAR 29 AM 9:09  
JULIAN ADAMS LEONG  
CLERK OF COURT

IT IS HEREBY ORDERED AND FURTHER STIPULATED AND AGREED by the parties, through counsel, that:

1. Any documents produced by any party during the course of discovery which are stamped or retroactively stamped "CONFIDENTIAL," and the information contained therein (hereinafter "confidential documents and information"), shall be used solely for purposes of the pending litigation herein, and for no other purpose by the receiving party. Furthermore, any such documents shall be used solely for purposes related to this lawsuit and appropriate steps shall be taken to prevent their disclosure or dissemination except as provided for by the provisions of Paragraph 3 below.

2. Information subject to this Order shall consist of the following:  
(a) Information received or obtained through the discovery process containing sensitive information relating to the healthcare, policies, business operations, revenue or income of the parties;

3. Confidential documents and information shall not be divulged to any person other than:

- (1) counsel for the parties and any staff member working for counsel;
- (2) expert witnesses retained by the parties;
- (3) witnesses identified by the parties in their discovery responses;  
and



(4) the parties, including officers, directors, shareholders, and insurance carriers of the parties who are directly involved with counsel's investigation or preparation of the case for trial.

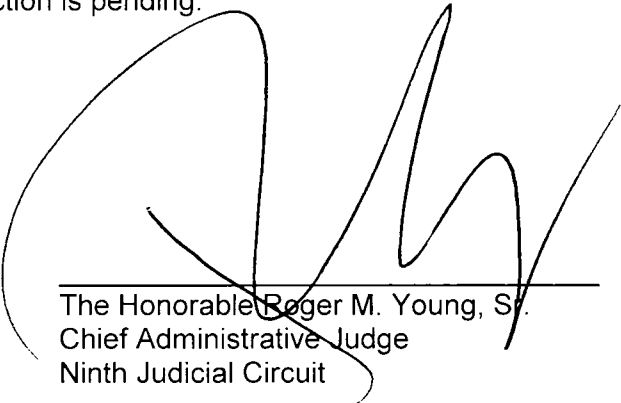
4. In the event confidential documents and information are disclosed to the persons in sections (2), (3), and (4) of paragraph 3 above, such persons shall, before such disclosure, be required to review and abide by the terms of this agreement.

5. The inadvertent production by any party to this litigation of materials that it deems confidential or privileged in any respect, including without limitation, materials protected by the attorney-client privilege and/or attorneys' work product privilege, shall not constitute a waiver of such privileges, a waiver of the party's right to seek a retroactive confidential designation of such, or a waiver of the party's right to request return of the privileged materials.

6. Within sixty (60) days from the final conclusion of this litigation, either party may request the return of all documents marked "CONFIDENTIAL", and the party to whom the request is made shall return such documents, including all copies thereof, within ten (10) days of the request. Otherwise and thereafter, all documents marked "CONFIDENTIAL" in the possession of the parties shall be destroyed.

7. A violation of this Protective Order shall entitle the aggrieved party to apply for sanctions from the Court in which the action is pending.

IT IS SO ORDERED.




The Honorable Roger M. Young, Sr.  
Chief Administrative Judge  
Ninth Judicial Circuit

Charleston, South Carolina

3/28, 2019

**WE SO MOVE:**

By:  \_\_\_\_\_

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Loggerheads Beach Grill*

**WE SO CONSENT:**

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of BSC

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March 26, 2019

The Honorable Roger M. Young, Sr.  
Chief Administrative Judge, Ninth Judicial Circuit  
100 Broad Street, Suite 368  
Charleston, SC 29401

RE: Kylie Erickson v. James Ventures, LLC d/b/a Loggerheads Beach Grill, and Jenna Mattox  
Case No.: 2018-CP-10-05822  
Our File No.: 22932.23

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Dear Judge Young:

Enclosed please find the proposed Consent Protective Order which has been executed with express consent of all counsel in the above-referenced matter. I have also enclosed the requisite Motion and Order Information Form and Cover Sheet, as well as my firm's check in the amount of \$25.00 for the filing fee. If the Order meets with Your Honor's approval, I would appreciate it greatly if you would forward it to the Clerk's office for filing. My office will retrieve a filed copy of the Order via *CourtPlus* and will disseminate it to all parties.

By copy of this letter to all counsel of record, I am providing a copy of the Consent Protective Order.

Thank you in advance for your consideration. Should you have any questions or require further information, please do not hesitate to contact our office.

With kindest regards, I am,

Respectfully,

ROGERS, TOWNSEND & THOMAS, PC

A handwritten signature in black ink, appearing to read "B. Cabot", is written over the typed name.

Brandon S. Cabot

BSC/dmc  
Enclosures (as stated above)  
cc: Christopher T. Dorsel, Esquire (w/ enc. via e-mail)  
Dan Ranaldo, Esquire (w/ enc. via e-mail)