

STATE OF SOUTH DAKOTA) IN CIRCUIT COURT
)ss:
 COUNTY OF HUGHES) SIXTH JUDICIAL CIRCUIT

STATE OF SOUTH DAKOTA, EX REL.) 32CIV18-125
 LARRY DEITER, DIRECTOR OF)
 INSURANCE OF THE STATE OF SOUTH)
 DAKOTA,)

Petitioner,)

**LIQUIDATOR’S MOTION FOR
 ENTRY OF A PROTECTIVE ORDER
 FOR CONFIDENTIALITY**

v.)

RELIAMAX SURETY COMPANY,)

Respondent.)

Larry Deiter, the duly appointed, qualified and acting Liquidator of ReliaMax Surety Company (“Surety”), by his counsel of record, hereby respectfully moves the Court for entry of a Protective Order for Confidentiality in the form submitted herewith, and in support of this Motion, respectfully states to the Court as follows:

1. As a part of the exercise of duties and powers in this Liquidation, the Liquidator is pursuing investigations, defending litigation, using his statutory subpoena power, defending claim disputes and pursuing claims that from time-to-time require parties and nonparties to produce documents and/or give testimony on subjects that may be confidential and proprietary in nature or are otherwise entitled or required by law to be protected.

2. To avoid delay, cumbersome and repetitive disputes and negotiations and to expedite progress of this Liquidation, the Liquidator deems it best for all proper purposes

of the liquidation that a single Protective Order for Confidentiality be entered that can be applicable to all proceedings and processes in the Liquidation.

3. The proposed Order submitted herewith is intended to protect both parties to the Liquidation and nonparties.

4. The form submitted herewith also permits challenges to confidentiality designations that would be resolved by the Court if need be.

Accordingly, the Liquidator respectfully requests that this Motion be in all respects granted.

Dated: August 9, 2019

CADWELL SANFORD DEIBERT
& GARRY LLP

By /s/ SW Sanford _____

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***Attorneys for Liquidator
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on August 9, 2019 a true and correct copy of the foregoing was served through Odyssey on those listed below:

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