



SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY

GORDON REEVE and WANDA SUE
REEVE, husband and wife,

Plaintiffs,

v.

UNION CARBIDE CORPORATION, et al.,

Defendants.

NO. 12-2-11999-1

ORDER DENYING J-M
MANUFACTURING COMPANY'S
MOTION FOR PROTECTIVE ORDER

~~PROPOSED~~

This matter comes before the court on Defendant J-M Manufacturing Company's Motion for Protective Order. In adjudicating this Motion, the Court has considered the following pleadings submitted by the parties;

- (1) Defendant J-M Manufacturing Company's Motion for Protective Order;
- (2) Declarations of David A. Shaw, Esquire;
- (3) Plaintiffs' Response in Opposition to J-M Manufacturing Company's Motion for Protective Order;
- (4) Declaration of Benjamin R. Couture;
- (5) J-M's REPLY BRIEF;
- (6) DECLARATION OF DAVID SHAW IN SUPPORT OF REPLY.

ORDER -

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WEINSTEIN COUTURE PLLC
1001 FOURTH AVENUE, SUITE 4400
SEATTLE, WA 98154
TELEPHONE: 206.389.1708
FACSIMILE: 206.389.1708
(Local Counsel for The Nemeroff Law Firm)

(7)

The Court, having reviewed Defendant J-M Manufacturing Company's Motion for Protective Order, and attached Exhibits, and Plaintiff's Response in Opposition thereto, and attached Exhibits, finds that ^{WORK PRODUCT} no privilege attaches to the J-M Manufacturing Company's inter-office Memorandum dated August 11, 1983, ^{AND THAT THE ATTORNEY-CLIENT PRIVILEGE WAS WAIVED} ~~that is the subject of Defendant J-M Manufacturing Company's Motion for Protective Order.~~ ^{DAS B.R.C.}

Based on the above findings, IT IS HEREBY ORDERED THAT Defendant J-M Manufacturing Company's Motion for Protective Order is DENIED in its entirety.

DONE IN OPEN COURT THIS 9th DAY OF MAY, 2013.

Vicki L Hogan
THE HONORABLE VICKI HOGAN

Presented By:

Ben R. Couture
Benjamin R. Couture, WSBA #39304
Brian Weinstein, WSBA #24497

Counsel for Plaintiffs

Approved as to Form:

David Shan
Counsel for Defendants

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FILED
DEPT. 5
IN OPEN COURT

MAY - 9 2013

Pierce County Clerk
By _____
DEPUTY

ORDER -

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