

From: [Mick Thomas](#)
To: [Kourtney Romine](#)
Subject: FW: Protective Order
Date: Thursday, August 02, 2018 10:30:44 AM

-----Original Message-----

From: Michael Christian <mchristian@mch-lawyer.com>
Sent: Thursday, August 2, 2018 9:59 AM
To: Randy Kauffman [REDACTED]; maggie@rischpisca.com
Cc: Mick Thomas <mthomas@idl.idaho.gov>
Subject: RE: Protective Order

Jason:

As your order reflects, my client's non-public production and financial records are confidential and proprietary, no matter which wells they relate to. Based on their statements, the Kauffmans' intent regarding the documents appears to go well beyond verifying or confirming gross production, disposition and market value, and as a result exceeds the intended scope of Idaho Code 47-332(4).

I do have the redacted hard copies available for the Kauffmans. As I understand their position, they do not wish for me to deliver the documents to them.

Thanks,

Michael Christian
MARCUS, CHRISTIAN, HARDEE & DAVIES, LLP
737 N. 7th Street
Boise, ID 83702
(208) 342-3563
mchristian@mch-lawyer.com

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-----Original Message-----

From: Randy Kauffman [REDACTED]
Sent: Thursday, August 2, 2018 9:05 AM
To: maggie@rischpisca.com
Cc: Michael Christian <mchristian@mch-lawyer.com>; Mick Thomas <mthomas@idl.idaho.gov>
Subject: Protective Order

Mr. Risch,

In your Order Denying Request For Relief From Protective Order, you stated: "The Protective Order was not entered because the information produced contained information relating to the wells unrelated to the Complainants." In the Protective Order you state: "Certain of the documents included in the information as

maintained by Respondents containing similar confidential, trade secret and proprietary information regarding wells in which Complainants do not own a royalty interest. The Respondents therefore having moved and requested this Hearing Officer for a Protective Order, the Hearing Officer, for reasons set for in the Order Regarding Discovery entered contemporaneously herewith, hereby grants said Motion and orders the production of the information under the following protective parameters:"

According to your own words, the Order was entered because the information produced contained information unrelated to the complainants.

The records to verify gross production, disposition and market value should not be subject to a Protective Order. That information is not a trade secret or proprietary. Alta Mesa has now redacted information unrelated to our wells. We should be able to receive this information directly from Alta Mesa without going through this lengthy process.

Therefore, we reassert our request seeking relief from the Protective Order.

Thank you,

Randy & Thana Kauffman
Sent from my iPhone