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9 UNITED STATES BANKRUPTCY COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION

12 In re

13 FOX ORTEGA ENTERPRISES, INC.,
14 dba PREMIER CRU,

15 Debtor.
16

Case No. 16-40050-WJL
Chapter 7

**STIPULATION FOR PROTECTIVE ORDER
REGARDING PRODUCTION OF CERTAIN
BANK RECORDS**

17 Community Bank of the Bay (“CBB”) and Michael G. Kasolas (“Trustee”), trustee of the
18 bankruptcy estate of Fox Ortega Enterprises, Inc., dba Premier Cru (“Debtor”), by and through
19 their counsel of record, stipulate to entry of an order as follows:

20 **RECITALS**

21 CBB was at all times from 2009 the Debtor’s primary commercial bank. The Trustee has
22 requested that CBB produce all wire instructions placed by or for the benefit of the Debtor since
23 2009 (the “Protected Information”). CBB believes that it may have obligations to protect the
24 privacy and financial rights of counter parties to such wire instructions and requires that any
25 production be made pursuant to a protective order that provides that the Trustee and his
26 professionals may not disclose or publish the Protected Information except upon CBB’s consent or
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1 further court order. The Trustee agrees to such conditions. Wherefore, the parties agree as
2 follows:

3
4 **STIPULATION**

5 1. Within one business day after entry of an order approving this stipulation, CBB
6 shall deliver the Protected Information to the Trustee.

7 2. The Trustee and his professionals may not disclose or publish the Protected
8 Information to any third party except upon written consent of CBB or upon further court order.

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10 DATED: March 10, 2016

RAPSON LAW OFFICE

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13 By: /s/ David Rapson

14 David Rapson
15 Attorneys for Community Bank of the Bay

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17 DATED: March 10, 2016

WENDEL, ROSEN, BLACK & DEAN LLP

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19 By: /s/ Mark Bostick

20 Mark Bostick
21 Attorneys for Michael G. Kasolas
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