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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: § Chapter 11
§
ROCKIES REGION 2006 LIMITED § Case No. 18-33513-sgj-11
PARTNERSHIP and ROCKIES REGION §
2007 LIMITED PARTNERSHIP §
§
Debtors. § Jointly Administered
§

MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

PDC Energy, Inc. ("PDC") files this Motion for Entry of Agreed Protective Order ("Motion") and respectfully moves for entry of the attached Protective Order which has been agreed to by PDC; Rockies Region 2006 Limited Partnership ("RR2006") and Rockies Region 2007 Limited Partnership ("RR2007" and together with RR2006, the "Debtors"); and Movants Robert R. Dufresne, as Trustee of the Dufresne Family Trust; Michael A. Gaffey, as Trustee of the Michael A. Gaffey and JoAnne M. Gaffey Living Trust dated March 2000; Ronald Glickman, as Trustee of the Glickman Family Trust established August 29, 1994; Jeffrey R. Schulein, as Trustee of the Schulein Family Trust established March 29, 1989; and William J.

McDonald, as Trustee of the William J. McDonald and Judith A. McDonald Living Trust dated April 16, 1991 (Movants collectively with PDC and Debtors, the “Parties”) in relation to any discovery taken in this bankruptcy proceeding. In support of this Motion, PDC states as follows:

I. JURISDICTION

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. § 1334. Consideration of this Motion is a core proceeding pursuant to 28 U.S.C. §§ 157(b)(2). Venue of this proceeding is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

II. BACKGROUND

2. On October 30, 2018 (the “Petition Date”), the Debtors each filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division (the “Court”). The Debtors’ chapter 11 cases are being jointly administered under Case No. 18-33513-SGJ-11.

3. On March 21, 2019, the Court entered the Agreed Scheduling Order [Docket No. 135] setting certain discovery and related deadlines.

III. RELIEF REQUESTED AND AUTHORITY

4. The Parties are in the process of collecting, reviewing, and producing documents responsive to certain discovery requests. The Parties are also taking depositions of witnesses in connection with the hearing scheduled on June 20, 2019. It is anticipated that a portion of the deposition testimony and responsive documents will contain information of a sensitive, confidential, proprietary, or legally protected nature. The Parties have agreed to the terms of the Protective Order attached hereto as Exhibit A to protect the disclosure of such information and the privacy rights of the Parties or certain non-parties.

5. The protections agreed to by the Parties in the Protective Order are an appropriate means for protecting the confidentiality of the documents to be produced by the Parties or non-parties and deposition testimony. Rule 26(c) of the Federal Rules of Civil Procedure, as incorporated by Bankruptcy Rule 7026(c), allows for entry of a protective order to protect the interests of the parties. The Protective Order is reasonable and justified under the circumstances.

WHEREFORE, PDC respectfully requests that the Court grant this Motion and enter the attached Protective Order, and grant to the Parties such other and further relief as is just and proper.

Dated: May 10, 2019

Respectfully submitted,

HUNTON ANDREWS KURTH LLP

By: /s/ Joseph P. Rovira
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the forgoing document was served on May 10, 2019 via the Bankruptcy Court's Electronic Case Filing notification system on those parties registered to receive such notices and *via* email on the parties listed below:

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