IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO
DENVER DIVISION

CRUSOE ENERGY SYSTEMS LLC,	§	
	§	
Plaintiff,	§	
	§	Civil Action No. 1:22-CV-2142
v.	§	Jury Trial Demanded`
	§	
ALKANE MIDSTREAM LLC,	§	
	§	
Defendant.	§	

PARTIES' JOINT STIPULATION FOR ENTRY OF AN INTERIM PROTECTIVE ORDER

Pursuant to the Court's August 29, 2022 Minute Order, the parties met and conferred to discuss whether the parties could reach agreement on a Protective Order. The parties have not yet reached agreement on all issues, and thus respectfully request that the Court enter this stipulated Interim Protective Order, which will govern until a final Protective Order is entered. The parties will work in good faith to negotiate and submit a stipulated protective order within 14 days from entry of this Interim Protective Order.

Under this Interim Protective Order, if any document or information produced or served in this matter is deemed in good faith to be highly confidential and competitively sensitive by the producing party, the document shall be marked "**Confidential – Outside Attorneys' Eyes Only**" by the disclosing party and disclosure of the confidential document or information shall be limited to each party's outside attorney(s) of record and the employees of such outside attorney(s). At all times reasonably possible, the disclosing party shall utilize redactions so that information that is deemed highly confidential and competitively sensitive is redacted and the remainder of the document may be made available to the non-disclosing party's client representatives and inside counsel. If a non-disclosing party disagrees with any designation, it shall notify in writing the disclosing party of such disagreement. If the parties are unable to resolve the disagreement, the non-disclosing party may seek relief from the Court.

Dated: September 1, 2022

STINSON LLP

/s/ Ryan M. Sugden
Ryan M. Sugden
STINSON LLP
1144 Fifteenth Street, Suite 2400
Denver, CO 80202
ryan.sugden@stinson.com
Telephone: (303) 376-8405

Attorneys for Defendant Alkane Midstream LLC

NORTON ROSE FULBRIGHT US LLP

/s/ Brett C. Govett
Brett C. Govett
brett.govett@nortonrosefulbright.com
Taylor Shields
taylor.shields@nortonrosefulbright.com
NORTON ROSE FULBRIGHT US LLP
2200 Ross Avenue, Suite 3600
Dallas, TX 75201-7932
Telephone: (214) 855-8120
Facsimile: (214) 855-8200

Stephanie DeBrow
stephanie.debrow@nortonrosefulbright.com
Daniel Shuminer
Colorado State Bar No. 53994
daniel.shuminer@nortonrosefulbright.com
NORTON ROSE FULBRIGHT US LLP
98 San Jacinto Boulevard, Suite 1100
Austin, Texas 78701
Telephone: (512) 563-3094
Facsimile: (512) 536-4598

Attorneys for Plaintiff Crusoe Energy Systems LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 1, 2022 all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system. Any other counsel of record will be served in accordance with the Federal Rules of Civil Procedure.

/s/ Brett C. Govett
Brett C. Govett