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BEFORE THE AMERICAN ARBITRATION ASSOCIATION

EMMANUEL D. KEPAS,

Claimant,

v.

EBAY INC., a Delaware corporation,

Respondent.

**[PROPOSED] STIPULATED
PROTECTIVE ORDER**

Case No. 77 160 00465 06 JOJO

IT IS HEREBY STIPULATED AND AGREED by and between counsel for the parties, subject to the approval of the Arbitrator, that the following Stipulation and Order shall govern the handling of documents, depositions, deposition exhibits, interrogatory responses, admissions, and any other information produced, given or exchanged by and among the parties and any non-parties to this action (such information hereinafter referred to as "Discovery Material"):

1. Any party or non-party who provides or has provided Discovery Material in connection with this action (the "Designating Party") may designate any Discovery Material as "Confidential" under the terms of this Stipulation and Order if the Designating Party believes in good faith that such Discovery Material contains non-public, confidential, proprietary or

commercially or personally sensitive information that requires the protections provided in this Stipulation and Order.

2. Information designated "Confidential" may be used only in connection with this action, and not for any other purpose. Such information may not be disclosed to anyone except as provided in this Order.

3. Any documents stamped "Confidential" as well as any copies or excerpts thereof, or analyses or reports which pertain thereto, may be made available only to:

- (A) The parties to this action and their officers, directors, or employees (if any) on a need to know basis;
- (B) Attorneys of record for the parties, their employees, and other attorneys and/or employees of their firms;
- (C) The Arbitrator and any of her respective staff and administrative personnel;
- (D) Stenographers transcribing the testimony or argument at a hearing, trial, or deposition in this action;
- (E) Experts who are identified at least ten (10) days prior to disclosure;
- (F) Witnesses who are questioned under oath, after such witnesses are informed of the confidential nature of the documents and have agreed to abide by the terms of this Order.

4. Any document submitted to the Arbitrator which is designated as containing "Confidential" information will be filed in a sealed envelope with the following statement:

"CONFIDENTIAL"

This document is subject to a PROTECTIVE ORDER and may not be examined or copied except in compliance with that Order.

5. Deposition or other testimony shall be designated "Confidential" (A) at the taking of the deposition by a statement on the record, by counsel at the time of such disclosure, or (B) by written notice sent to counsel of record for all parties within three (3) business days after receiving a copy of the transcript thereof, identifying the specific pages thereof designated as "Confidential." Only those portions of the transcripts designated as "Confidential" shall be deemed "Confidential."

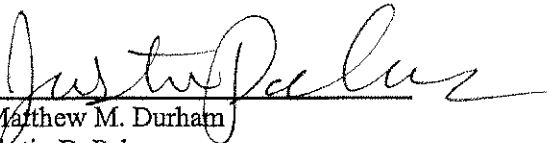
6. If, at any time, a party believes that another party has unreasonably designated certain information as "Confidential," or believes that it is necessary to disclose "Confidential" information to persons other than those permitted by this Order, and the Designating Party does not agree to change the designation or to the further disclosure, the party may make an appropriate application to the Arbitrator requesting that the specifically identified documents, information, and/or deposition testimony be excluded from the provisions of this Order or be made available to specified other persons.

7. This Order will not prejudice the right of any party to oppose production of any information on the ground of attorney-client privilege, work product immunity, or any other protection provided under the law.

STIPULATED AS TO FORM AND SUBSTANCE.

DATED: 7/27/07

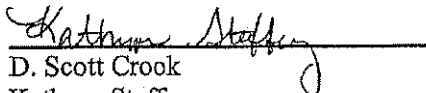
STOEL RIVES LLP



Matthew M. Durham
Justin B. Palmer
Attorneys for Respondent

DATED: 7/27/07

SMITH HARTVIGSEN



D. Scott Crook
Kathryn Steffey
Attorneys for Claimant

IT IS SO ORDERED.

DATED: 7/30/07



Arbitrator