

Honorable Jacqueline A. Connor (Ret.)
 ADR SERVICES, INC.
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 Los Angeles, California 90067
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 Emergency Arbitrator

ADR SERVICES, INC.

IN RE THE MATTER OF THE ARBITRATION BETWEEN

EC, LLC,

Claimant,

v.

PEGGY PETERSON,

Respondent

) ADRS Case No. 18-1118-JAC

) TEMPORARY RESTRAINING ORDER

By written emergency application with exhibits pursuant to Rule 24 of the ADR Services, Inc. Arbitration Rules, Claimant EC, LLC has requested an emergency order precluding Respondent Peggy Peterson ("Ms. Peterson") from (i) disclosing or inducing, promoting or actively inspiring anyone to disclose Confidential Information, as defined in the "Confidential Settlement Agreement and Mutual Release: Assignment of Copyright and Non-Disparagement Agreement," effective October 28, 2016 (the "Settlement Agreement") whether in the media, court filings, or otherwise, (ii) disclosing or inducing, promoting, or actively inspiring anyone to disclose the fact of the commencement and pendency of this Arbitration and any details relating thereto, including, but not limited, to the existence of this Emergency Application and any emergency order issued in response to that application (the "Emergency Application").

ADR Services, Inc. has appointed the undersigned, Honorable Jacqueline A. Connor (Ret.), as the Emergency Arbitrator to hear the emergency application. Having reviewed the emergency application, including the parties' Settlement Agreement and other exhibits, the

CONFIDENTIAL PROCEEDING

Emergency Arbitrator finds that the Settlement Agreement expressly authorizes issuance of an *ex parte* restraining order without the requirement of advance notice to Ms. Peterson in the event she has breached or threatened to breach the confidentiality obligations expressly agreed upon in the Settlement Agreement.

Upon due consideration, the Emergency Arbitrator issued a tentative ruling and order, which was accepted on submission without oral argument by Claimant and Claimant's counsel.

NOW, THEREFORE, upon Claimant's application, it is hereby ORDERED that the Emergency Application is GRANTED, in part, as follows:

1. Pending further determination by the selected or appointed Arbitrator(s), Ms. Peterson is precluded from disclosing or disclosing or inducing, promoting or actively inspiring anyone to disclose Confidential Information, as defined in the "Confidential Settlement Agreement and Mutual Release: Assignment of Copyright and Non-Disparagement Agreement," effective October 28, 2016 (the "Settlement Agreement") whether in the media, court filings, or otherwise; and

2. Pending further determination by the selected or appointed Arbitrator(s), Ms. Peterson is precluded from disclosing or inducing, promoting, or actively inspiring anyone to disclose the fact of the commencement and pendency of this Arbitration and any details relating thereto, together with all proceedings and papers filed herein including, but not limited, to EC's Emergency Application and this Order; and

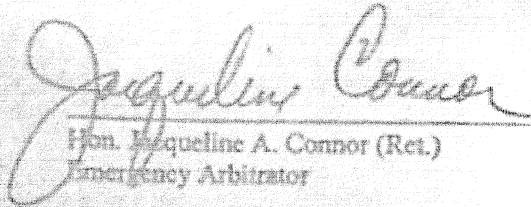
3. The foregoing shall not apply if, in accordance with Paragraph 4.4.1 of the Settlement Agreement, Ms. Peterson is compelled to disclose Confidential Information to another person or entity by valid legal process, including without limitation, a subpoena duces tecum or similar legal compulsion. Ms. Peterson shall not make any such disclosure unless she has first provided DD with notice of such order or legal process not less than ten (10) days in advance of the required date of disclosure pursuant to the Written Notice provisions set forth in the parties' Settlement Agreement, providing DD with an opportunity to intervene and with full and complete cooperation should such disclosure be opposed. If the valid legal process can be stopped by Ms. Peterson's consent or at her behest, Ms. Peterson shall use best efforts to avoid the disclosure of the Confidential Information.

CONFIDENTIAL PROCEEDING

The Emergency Arbitrator retains the power to modify or reconsider this interim order with the appointment of an arbitrator or arbitration panel for consideration of the entire matter. (Pursuant to 24.)

IT IS SO ORDERED.

DATED: February 27, 2018


Hon. Jeannine A. Connor (Ret.)
Emergency Arbitrator