

IN THE CHANCERY COURT FOR THE STATE OF TENNESSEE  
TWENTIETH JUDICIAL DISTRICT, DAVIDSON COUNTY

UNIVERSAL STRATEGY GROUP, )  
INC., )  
 )  
Plaintiff, )  
 )  
VS. ) NO. 16-15-BC  
 )  
BRIAN DAVID HALSTEAD, )  
 )  
Defendant. )  
\_\_\_\_\_)  
 )  
BRIAN DAVID HALSTEAD, in his )  
individual capacity and derivatively for )  
UNIVERSAL STRATEGY GROUP, )  
INC., )  
 )  
Counter-Plaintiff, )  
 )  
VS. )  
 )  
UNIVERSAL STRATEGY GROUP, )  
INC., and TIMOTHY SLEMP, )  
 )  
Counter-Defendants. )

CONSOLIDATED WITH

UNIVERSAL STRATEGY GROUP, )  
INC., )  
 )  
Plaintiff, )  
 )  
VS. ) NO. 17-136-BC  
 )  
BRIAN DAVID HALSTEAD, )  
 )  
Defendant. )

**ORDER: (1) FOR PRODUCTION OF OAK GROVE TECHNOLOGY  
DOCUMENTS/REQUEST NO. 5 UNDER AEO PROVISION OF  
PROTECTIVE ORDER; (2) SETTING RULE 16 DEADLINES**

On August 16, 2017, a hearing on discovery and entering a Rule 16 Order was conducted. From that hearing, the following is ORDERED.

1. Oak Grove Technologies Discovery—With respect to Counter Defendant Slemp’s Request for Production No. 5, Counter Plaintiff Halstead shall produce by August 25, 2017, the Oak Grove Technologies (“OGT”) documents under the “Attorneys Eyes Only” provision of the Protective Order (“AEO”) entered in this case. On September 15, 2017, the “AEO” designation on the OGT documents shall no longer be in effect and the OGT documents shall be designated thereafter as confidential under the terms of the Protective Order entered in this case subject to disclosure at trial if so determined by the Court.

Counsel for Halstead shall serve Oak Grove Technologies with a copy of this Order. If Oak Grove Technologies objects to the foregoing, it shall file a motion for a protective order before September 15, 2017.

2. USGI Respond to Halstead Discovery—By September 8, 2017, Plaintiff Universal Strategy Group, Inc. (“USGI”) shall respond to Defendant Halstead’s discovery requests filed January 27, 2017. If the Defendant challenges objections asserted by USGI or completeness of USGI’s responses or other issues with the discovery, Halstead shall promptly file a motion to compel and may, but is not required, to meet and confer.

3. Interpleader of Promissory Note Payments—Plaintiff USGI announced that it anticipates pleading into the registry of the Court by September 15, 2017, funds related to Defendant Halstead’s Counterclaim for recovery on promissory notes. If Defendant Halstead decides to seek a partial summary judgment ruling on USGI’s entitlement to interplead based on a claim of offset, that summary judgment motion shall be filed by September 29, 2017.

4. Pre-deposition Summary Judgments—Any summary judgment motions Counter Defendant Slemo or Plaintiff USGI seeks to file before depositions are taken shall be filed by September 29, 2017.

5. Electronically Stored Information (“ESI”)—By October 13, 2017, Counsel shall file a report with the Court identifying the electronic devices from which the parties do not agree discovery should be collected. On this dispute, the Court will set a briefing schedule and notify Counsel whether there shall be oral argument or a ruling on the papers.

As to those devices Counsel agree discovery should be collected from, by October 13, 2017, Counsel shall have furnished their search terms to the vendor, arranged for collection of data to proceed, and report those arrangements in the October 13, 2017 filing.

6. Post ESI Yield, Hearing to Limit Scope—Counsel shall notify the Court when the vendor has furnished its spreadsheet on the number of returns for each search term. The Court shall schedule a hearing to review the vendor’s spreadsheet and enter rulings on the scope of the production of the ESI that is calculated to lead to the discovery of admissible

evidence but whose cost, to be reviewed by Counsel for privilege and other matters, is proportionate to the claims and defenses in the case.

7. Depositions Stayed—Depositions are stayed until further Order.

8. Telephone Conference on Scope of Depositions—A telephone conference shall be conducted at noon on October 19, 2017, to identify deponents, sequence their depositions and limit the duration of the depositions, and to select a trial date.

*/s/ Ellen Hobbs Lyle*

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ELLEN HOBBS LYLE  
CHANCELLOR  
BUSINESS COURT DOCKET  
PILOT PROJECT

cc by U.S. Mail, email, or efile as applicable to:

Bryan K. Williams  
J. Alex Little  
W. Justin Adams  
John R. Jacobson  
D. Andrew Curtis