

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS  
STATE OF MISSOURI

In re the Marriage of:	)	
	)	
ANGELA L. PORTER,	)	
	)	
Petitioner,	)	Cause No. 18SL-DR03675
	)	
v.	)	
	)	Division No. 31
DAVID PORTER,	)	
	)	
Respondent.	)	

**JOINT MOTION TO SET SECURITY CLEARANCE AT THE HIGHEST  
ALLOWABLE LEVEL**

COME NOW Petitioner, Angela L. Porter, and Respondent, David R. Porter, by and through counsel, and for their Joint Motion to Set Security Clearance at the Highest Allowable Level, state the following:

1. The parties request this Court raise the security clearance to the highest allowable level for the following documents (collectively the "Settlement Documents") so that it is only accessible by the Court, court staff, and attorneys of record, until further order of this Court:

- a) the Marital Settlement and Separation Agreement;
- b) the Form 14; and
- c) the Judgment (with the exception of minute entries setting forth specific money judgments owed by one party to the other or a third party).

2. Failure to raise the security level of the Settlement Documents places the parties at risk as follows:

- a) The Settlement Documents contain sensitive personal and business information regarding the substantial assets and interests of the parties;

b) The parties' case has already generated media attention, including but not limited to a news article entitled "FURminator founders locked in contentious divorce"<sup>1</sup>;

c) The parties desire to protect their children from access to certain information regarding the parties' assets, including certain assets which may eventually become the property of the children; and

d) There are several ancillary cases pending both between the parties and with third parties, the status of and strategy for which may be referenced in the Settlement Documents.

3. The parties verily believe that certain third parties may attempt to obtain the foregoing and other information of the parties.

4. Raising the security clearance to the highest allowable level for the Settlement Documents is in the best interest of the parties and their children to protect the privacy of their settlement information.

5. This shall not prevent any party from bringing an action for enforcement of any of the obligations contained in the Settlement Documents.

WHEREFORE, the undersigned pray that this Court raise the security clearance to the highest allowable level so that it is only accessible by the Court, court staff, and attorneys of record, for the following:

1. the Marital Settlement and Separation Agreement;
2. the Form 14; and

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<sup>1</sup> Joe Hollerman, *FURminator founders locked in contentious divorce*, St. Louis Post-Dispatch, July 19, 2019, available online [https://www.stltoday.com/news/local/columns/joe-holleman/furminator-founders-locked-in-contentious-divorce/article\\_baa930ea-d582-541f-ba1e-85ba247f49a6.html](https://www.stltoday.com/news/local/columns/joe-holleman/furminator-founders-locked-in-contentious-divorce/article_baa930ea-d582-541f-ba1e-85ba247f49a6.html) (last accessed March 3, 2020).

- 3. the Judgment (with the exception of minute entries setting forth specific money judgments owed by one party to the other or a third party).

and for such other and further Orders as the Court deems just and proper under the circumstances.

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 David R. Porter

**SO ORDERED:**

\_\_\_\_\_  
 Michael Burton  
 Presiding Judge  
 Division 16

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 14th day of April, 2020, a true and correct copy of the foregoing was served by electronic filing on all counsel of record pursuant to Rule 103.08.

