

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
PINE BLUFF DIVISION

SEP 29 2010

CHRISTOPHER HOLLIS

PLAINTIFF

v.

Case No. 5:10-CV-00021 JMM

**TEDDY HAWKINS, Sheriff's Deputy
of Jefferson County, Arkansas; ROBIN
NELLONS, Sheriff's Deputy of Jefferson
County, Arkansas; TERRY WINGARD,
Sheriff's Deputy of Jefferson County,
Arkansas; ROBERT JACKSON, Sheriff's
Deputy of Jefferson County, Arkansas;
JESSE NELSON, Sheriff's Deputy of
Jefferson County, Arkansas; RUEBEN CAMP,
Sheriff's Deputy of Jefferson County,
Arkansas; MARYLYN WASHINGTON,
Sheriff's Deputy of Jefferson County, Arkansas;
FNU GRIFFIN, Sheriff's Deputy of Jefferson
County, Arkansas**

DEFENDANTS

AGREED PROTECTIVE ORDER

Plaintiff has requested discovery of records containing sensitive personnel information. In order to permit Plaintiff adequate access to the records necessary to completely present this case herein, and, at the same time to address privacy concerns, it is hereby ORDERED, ADJUDGED and DECREED as follows:

1. Counsel for Separate Defendants has agreed to produce the personnel files of the requested officers, with all personal information redacted;
2. Said documents shall be considered confidential;
3. All confidential records or other information provided hereunder shall be used for the purpose of this litigation and none of the confidential material may be used for any other

purpose whatsoever. Moreover, neither Plaintiff nor his counsel may utilize directly or indirectly the confidential records, documents, or other information made available pursuant to this Order in any other administrative complaint, proceeding, or civil action;

4. All confidential records, documents, tapes, or other information provided hereunder shall be retained in the custody of the Plaintiff's counsel including their paralegal, secretarial staff, and/or other staff members, during the pendency of this litigation. Plaintiff's counsel may also provide copies of such confidential records, documents or other information to any expert witness[es] retained by Plaintiff or persons frequently employed by such expert[s] whose review of the material is necessary for the Plaintiff's prosecution in this litigation;

5. If confidential documents or records are used during depositions, the depositions shall be treated as confidential in accordance with this Order;

6. Any document, information or deposition designated as confidential under this Order shall, when filed with the Court, be clearly marked "confidential" sealed, placed in separate, secure storage by the Clerk, and opened only by authorized Court personnel;

7. Plaintiff, Plaintiff's counsel and their staff and the retained expert witness/witnesses shall not in any manner, directly or indirectly, transfer confidential records, documents or other information provided hereunder or copies thereof, or communicate, orally or in writing, any of the data contained in said material to any person;

8. Plaintiff's counsel, promptly upon completion of this litigation, or before if at such time they have no further use of the confidential information, whichever shall first occur, shall return to the Defendant all materials produced, and all copies and extracts of data from such materials;

9. This Protective Order shall govern all pre-trial proceedings, but shall be subject to modification either before, during or after the trial on the merits, upon application of any of the parties to this lawsuit and for good cause shown.

10. The provisions of this Order shall not affect the admissibility of evidence at trial or any preliminary evidentiary proceeding in open court, except as directed by separate Order of this Court.

11. This Order is without prejudice to the rights of any party to make objections to the discovery as permitted by the Federal Rules of Civil Procedure, or by any statute or other authority.

IT IS SO ORDERED THIS 1 DAY OF Oct, 2010.


United States District Judge

APPROVED BY:


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