

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Case Number: 10-cv-02695-WDM-KLM

FRANK LORD

Plaintiff,

v.

COLORADO SPRINGS POLICE OFFICERS JASON HALL AND RICHARD HAYES; and  
UNKNOWN COLORADO SPRINGS POLICE OFFICERS

Defendants.

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**STIPULATED PROTECTIVE ORDER**

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IT IS HEREBY STIPULATED AND AGREED, by and between the respective parties hereto and their counsel of record, that Defendants Jason Hall and Richard Hayes will produce certain documents which they consider confidential, in particular their personnel and/or IA records, and in Response to Plaintiff's Request for Production of Documents. Since the materials referred to above are privileged, the production of the documents by the defendant and use of the documents by Plaintiff and his counsel will be conducted pursuant to the following terms, restrictions and conditions:

1. Information obtained by the plaintiff and his counsel from the documents and the documents themselves shall be used only for the purpose of prosecuting this action and only this action.

2. Plaintiff and his counsel agree that the documents and the information obtained from the documents shall not be released to any other person, with the exception of an individual assisting counsel in preparation for or at the trial of this action or a person who is expressly retained by Plaintiff or his counsel for the purpose of testifying or giving opinions in this litigation.

3. Whenever a deposition involves the disclosure of CONFIDENTIAL information, the deposition or portions thereof shall be designated as CONFIDENTIAL and shall be subject to the provisions of this Protective Order. Such designation shall be made on the record during the deposition whenever possible, but a party may designate portions of depositions as CONFIDENTIAL after transcription, provided written notice of the designation is promptly given to all counsel of record within thirty (30) days after notice by the court reporter of the completion of the transcript.

4. The production of such documents or information by the parties shall not constitute a waiver of any privilege, or claim or confidentiality.

5. Within thirty (30) days after the conclusion of this litigation, unless other arrangements are agreed upon, each document and copies thereof shall be returned to the City. Moreover, copies of all deposition transcripts referring to the CONFIDENTIAL documents shall be sealed by counsel and shall be subject to the terms and provisions of this Protective Order.

6. This Confidentiality Agreement survives this case for the purpose of enforcement.

[Signature page follows]

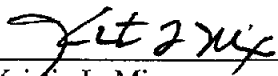
Dated this 6<sup>th</sup> day of April, 2011.

BY THE COURT:

Protective Order Approved:

s/ Daniel G. Kay

Daniel G. Kay  
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Counsel for Plaintiff

  
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Kristen L. Mix  
United States Magistrate Judge

Kristen

s/ Shane White

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