

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 11-cv-01556-REB-MJW

JARROTT MARTINEZ,

Plaintiff,

v.

CITY OF COLORADO SPRINGS,
SYDNEY HUFFMAN, and
MICHAEL JELMO,

Defendants.

SUPPLEMENT TO STIPULATION AND PROTECTIVE ORDER

[Docket No. 42-1]

The parties hereto stipulate and move the Court to supplement the Stipulation and Protective Order in place in this matter (Docket No. 37) to include the following:

1. In this action, certain evidence consists of highly personal photographs. Such photographs include, but are not limited to, photographs downloaded from personal cell phones of persons not a party to this matter as well as photographs taken during one or more medical evaluations. These photographs contain graphic and highly personal images. The parties assert that protections additional to those set forth in the Stipulation and Protective Order should be in place in order to maintain the parties' privacy interests. In order to maintain such privacy, the parties have entered into this stipulation and request

the Court to enter the within Supplement to Stipulation and Protective Order for the purpose of preventing the disclosure and use of such information except as set forth herein.

2. The parties stipulate to supplementing the Stipulation and Protective Order in order to include additional protections for such photographs, as follows:

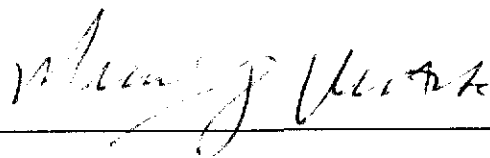
a. Such photographs will be marked "CONFIDENTIAL PHOTOGRAPH" and shall be subject to the procedures and protections outlined in the Stipulation and Protective Order (Docket No. 37);

b. Such photographs will not be accessed by any person except those counsel, legal staff, or experts who have a direct need to view such photographs in relation to their work on this matter;

c. Such photographs, including any copies of such photographs in either digital or hard copy form, will be destroyed after the conclusion of this litigation.

Done this 20th day of October, 2011.

BY THE COURT:



MICHAEL J. WATANABE
U.S. MAGISTRATE JUDGE
DISTRICT OF COLORADO