

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No. 14-cv-03400-KLM

SEAN TAFOYA,

Plaintiff,

v.

FALCON FIRE PROTECTION DISTRICT, and  
TRENT HARWIG, individually and in his official capacity,

Defendants.

---

STIPULATED ORDER

---

The production of privileged or work-product protected documents, electronically stored information (“ESI”) or information, whether inadvertently or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Stipulated Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

Nothing contained herein is intended to or shall serve to limit a party’s right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness and/or segregation of privileged and/or protected information before production.

s/ Megan K. Mechak  
Thomas A. Woodley  
Megan K. Mechak

s/ Richard L. Shearer  
Richard L. Shearer  
SHEARER & CALL, P.C.

T. Reid Coploff  
WOODLEY & MCGILLIVARY LLP  
1101 Vermont Avenue, N.W.  
Suite 1000  
Washington, DC 20005  
Phone: 202-833-8855

1625 Broadway  
Suite 1450  
Denver, CO 80202  
Phone: 720-833-4221

Thomas Buescher  
BUESCHER, KELMAN  
& PERERA P.C.  
600 Grant Street  
Suite 450  
Denver, CO 80205  
Phone: 303-333-7751

Counsel for Plaintiff

Counsel for Defendants

**SO ORDERED**

Dated: April 30, 2015

  
Hon. Kristen L. Mix United States Magistrate Judge