

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
Baltimore Division**

ALBERT SNYDER,)	
)	
Plaintiff)	Civil Action No. 06-CV-1389-RDB
)	
FRED W. PHELPS, SR., et al,)	
)	
Defendants.)	

STIPULATION AND CONSENT ORDER CONCERNING DISCOVERY

By stipulation of the parties, this agreement shall govern the taking of depositions of defendant Fred W. Phelps, Sr. (“Phelps”) and the corporate representative of defendant Westboro Baptist Church, Inc. (“Westboro”).

1. The parties by and through counsel conducted a scheduling conference with the Court on November 28, 2006. The Court authorized the parties to begin discovery.
2. The parties have agreed that the depositions of defendant Phelps will be taken in Topeka, Kansas on March 5, 2007.
3. No counsel of record is admitted to practice law in Kansas.
4. Neither plaintiff nor any of plaintiff’s counsel are conducting business in Kansas at this time, or have any other contacts there, and will be appearing in Topeka, Kansas, for the limited purpose of taking this deposition.

5. Plaintiff and his counsel accepted Topeka, Kansas as the forum for deposing defendant Phelps solely to accommodate this defendant.
6. Defendants agree that they will not use the occasion of plaintiff or any of plaintiff's counsel traveling to Kansas for this deposition as the occasion to serve process, summons, or any other kind of legal process on plaintiff or any of his counsel.
7. Defendants agree that they will not use the occasion of plaintiff or any of plaintiff's counsel traveling to Kansas for this deposition as the occasion to claim jurisdiction by any court over plaintiff or plaintiff's counsel.
8. Phelps-Chartered is a corporation engaged in the practice of law in Kansas. Phelps-Chartered is not a party to this case and does not appear before this Court. The attorneys employed by Phelps-Chartered are not parties to this case and do not appear before this Court. Defendants and their counsel have conferred with the attorneys of Phelps-Chartered, and those attorneys have all agreed not to serve legal process or claim jurisdiction on or against plaintiff or any of his counsel during or based upon their trip to Topeka, Kansas to depose defendant Phelps on March 5, 2007. Defendants so agree hereby through the signature of their counsel.

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