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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON**

ANDREA JOY LYONS, Pro Se;
MARK GEERHART, Pro Se,
Plaintiffs,

NO. 1:17-CV-3108-TOR
PROTECTIVE ORDER

v.

STATE OF WASHINGTON,
CHILD PROTECTIVE
SERVICES, a Division of THE
DEPARTMENT OF SOCIAL
AND HEALTH SERVICES;
Employee's FRANCESCA
GUZMAN In Their Individual
and Official Capacity; EAST
VALLEY ELEMENTARY
SCHOOL, DISTRICT NO. 90,
Yakima County; State of
Washington; COLEEN
CROWSTON, In her official and
individual capacity as Principal of
East Valley Elementary School;
LISA BARTHELD (Counselor)
In Their Individual and Official
Capacity; CAROLYN SAUVE
(Admin. Assist.) In Their
Individual and Official Capacity;
and MELODY-ANN LUKE
(R.N) In Their Individual and
Official Capacity,
Defendants.

1 THIS MATTER having come on regularly before this Court on
2 Defendants' Motion for a Protective Order in response to Plaintiffs' first set of
3 discovery to the State of Washington Department of Social Health Services (the
4 Department), and the Court having considered the statutory provisions
5 establishing that the Department's records, files and information requested are
6 confidential and privileged, and also having considered that some of those
7 documents and information are likely to lead to the discovery of admissible
8 evidence in this case, the Court hereby finds that defendant State of Washington
9 is authorized to produce for inspection and copying by counsel for all parties in
10 this case, without redactions, Department case note records of Andrea Lyons and
11 Kevin Teeman regarding alleged abuse or neglect of C.T. by Kevin Teeman, as
12 requested in Plaintiffs' Request for Production No. 1 to defendant State of
13 Washington, including any mental health, drug or alcohol records, subject to the
14 terms of this protective order. In addition, the Department is authorized to
15 release medical records of C.T. that it has in its possession from Yakima
16 Regional Hospital. This protective order shall apply to all documents and
17 information contained in the above-described files maintained by the
18 Department and to depositions hereinafter taken in which said documents are
19 identified, discussed, or otherwise used.

20 IT IS HEREBY ORDERED that all documents and information contained
21 in the aforementioned Department case files and records of Andrea Lyons and
22 Kevin Teeman, including references to or identification of any other individuals

1 identified in those investigative files and records, shall not be disclosed to any
2 person, except to the parties and their attorney(s), experts retained by the parties'
3 attorney(s), their staff, persons otherwise entitled to obtain the information
4 pursuant to statutory exemptions from confidentiality, and other individuals as
5 herein provided.

6 IT IS FURTHER ORDERED that prior to introducing as evidence or
7 otherwise disclosing to a jury the existence of any of the aforementioned
8 information or documents a hearing shall be held outside the presence of the jury
9 wherein the Court will determine the admissibility of the aforementioned
10 information or records.

11 IT IS FURTHER ORDERED that counsel for the parties shall use all
12 documents and information produced or disclosed pursuant to this Order solely
13 for the purpose of preparation for and trial of this action. Under no
14 circumstances shall information or materials covered by this Order be disclosed
15 to anyone other than as provided in this Order. At the conclusion of the
16 proceedings in this action, including any appeal, all documents and information
17 subject to this order, including any copies or summaries thereof, or documents
18 containing information taken therefrom, shall be returned to counsel for the party
19 producing such documents and/or destroyed by the party having such
20 documents. A copy of this Order shall accompany any copy of the records or
21 information protected by this Order that is released to anyone. No attorney,
22 party, or expert shall disclose any information gained or derived from the

