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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

ALAN CAMPBELL, individually and as Mitchell Campbell’s grandfather, and his capacity as the Personal Representative for the Estate of Mitchell Campbell; DIANE CAMPBELL, individually and as Mitchell Campbell’s grandmother; and MC, the biological minor daughter of Mitchell Campbell, by and through a GAL to be named,

Plaintiffs,

v.

OUR LADY OF LOURDES HOSPITAL AT PASCO, d/b/a Lourdes Medical Center; KEVIN S. OWENS, M.D., in his professional and individual capacity and his spouse, Jane Doe Owens; CITY OF PASCO; CITY OF PASCO POLICE DEPARTMENT; CITY OF PASCO CHIEF OF POLICE ROBERT METZGER, in his official capacity as well as his individual capacity, and his spouse Jane Doe Metzger, individually; CITY OF PASCO POLICE OFFICER ROBERT HARRIS, in his official capacity as well as his individual capacity, and his spouse Jane Doe

NO: 4:16-CV-5048-RMP

PROTECTIVE ORDER

1 Harris, individually; CITY OF PASCO
2 OFFICER MATT GRIFFIN, in his
3 official capacity as well as his
4 individual capacity, and his spouse
5 Jane Doe Griffin; FRANKLIN
6 COUNTY; FRANKLIN COUNTY
7 SHERIFF RICHARD LATHIM, in his
8 official capacity as well as his
9 individual capacity, and his spouse
10 Jane Doe Lathim; CAPTAIN RICK
11 LONG, in his official capacity as well
12 as his individual capacity, and his
13 spouse Jane Doe Long; FRANKLIN
14 COUNTY CORRECTIONS OFFICER
15 JESSICA BROOKS, in her official
16 capacity as well as her individual
17 capacity, and her spouse John Doe
18 Brooks; FRANKLIN COUNTY
19 CORRECTIONS OFFICER YVETTE
20 WILSON, in her official capacity as
21 well as her individual capacity, and her
spouse John Doe Wilson; and DOES 1-
12,

Defendants.

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15 On September 15, 2016, the parties, by and through their attorneys, agreed
16 and stipulated pursuant to FRCP 29, to a protective order regarding certain
17 “Protected Documents.” Accordingly, **IT IS HEREBY ORDERED** that the
18 parties’ Stipulated Motion for Protective Order, **ECF No. 29**, is **GRANTED**.

19 The following provisions constitute the Protective Order regarding release of
20 protected documents in this matter:
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1 1. The parties shall not disclose or share any part of the “Protected
2 Documents” described below or any information gleaned from said documents with
3 any person except as expressly provided herein.

4 2. The Protected Documents covered by this Stipulation and the
5 subsequent Order of the court are described as follows: All files, personnel or
6 otherwise, maintained by the City of Pasco Police Department for officers Robert
7 Harris and Matt Griffin.

8 3. Prior to any disclosure of Protected Documents as described in this
9 Order the parties shall obtain from each proposed recipient of the Protected
10 Documents their signature on a copy of the Protective Order that states that the
11 recipient has received a copy of the Protective Order regarding the Protected
12 Documents and agrees to be bound by such order. By signing a copy of the
13 Protective Order the recipient agrees that he or she has read the Order, represents
14 that he or she is a person permitted to have access to information from the Protected
15 Documents and agrees that he or she will make no further disclosure of the
16 information received, will personally protect the confidentiality of all copies and will
17 either return them to the producing parties’ attorneys at the conclusion of this case,
18 or will at that time personally destroy them and upon request from the producing
19 parties provide a sworn affidavit that he or she has done so.

1 4. Subject to the terms of this Order, the parties may allow inspection of
2 Protected Documents or discuss the contents of Protected Documents or information
3 therefrom with only the following categories of persons and no other:

4 a. Duly licensed and professional experts, consultants or
5 investigators retained to assist in evaluation, preparation or testimony in this case;

6 b. Any court personnel, court reporter, mediator, judge and or jury
7 in this case;

8 c. Any person identified as having authored or previously received
9 the material.

10 5. If it becomes necessary for any party to submit a Protected Document
11 to the court, that party shall inform the producing party with sufficient time prior to
12 the filing of the Protected Document such that a motion to seal the Protected
13 Document can be noted prior to filing. A motion to seal will not be granted unless
14 the motion and supporting documents establish compelling reasons to seal.

15 6. The parties shall use the Protected Documents or information obtained
16 from them only for the purpose of prosecuting this litigation.

17 7. At the time of exchange of exhibit lists, the parties shall list in the
18 exhibit list for their case in chief any Protected Document they intend to use at the
19 time of trial by designating the exhibit as a “PROTECTED DOCUMENT” in capital
20 letters. Any other party may request an in camera review of the exhibit and make
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1 the appropriate motion for the handling of the document at trial in accordance with
2 the Jury Trial Scheduling Order.

3 8. Nothing in this Protective Order shall limit any producing party's use of
4 its own documents or prevent any producing party from disclosing its confidential
5 information to any person.

6 9. The Court retains jurisdiction to make any amendments, modifications
7 or additions to the Protective Order as it deems appropriate.

8 10. The parties, by stipulation, may add additional documents to be covered
9 by this Order.

10 This District Court Clerk is directed to enter this Order and provide copies to
11 counsel.

12 **DATED** this 15th day of September 2016.

13
14 *s/ Rosanna Malouf Peterson*
15 ROSANNA MALOUF PETERSON
16 United States District Judge
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