

THE HONORABLE RICARDO MARTINEZ

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

KENNETH FLEMING, JOHN DOE, R.K.,
and T.D.,

Plaintiffs,

v.

THE CORPORATION OF THE PRESIDENT
OF THE CHURCH OF JESUS CHRIST OF
LATTER-DAY SAINTS, a Utah corporation
sole, a/d/a "MORMON CHURCH";
LDS SOCIAL SERVICES a/d/a LDA
FAMILY SERVICES, a Utah corporation,

Defendants.

NO. C04-2338 RSM

**STIPULATION AND PROTECTIVE
ORDER**

Noted: January 12, 2006

I. STIPULATION

This Stipulation is entered into by and between Gordon, Thomas, Honeywell,
Malanca, Peterson & Daheim LLP, as well as The Law Offices of Timothy D. Kosnoff, on
behalf of plaintiffs, and Stafford Frey Cooper on behalf of defendants.

The parties stipulate as follows:

1. This Stipulation is intended to specify the handling of all documents and
information that identifies the names of non-party victims of sexually inappropriate conduct

STIPULATION AND PROTECTIVE ORDER - 1 of 3
(C04-2338 RSM)
[156064 v6.doc]

LAW OFFICES
GORDON, THOMAS, HONEYWELL, MALANCA,
PETERSON & DAHEIM LLP
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SEATTLE, WASHINGTON 98101-4185
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1 by Jack LoHolt of whom Philip J. Coleman became aware while he was serving as bishop
2 and/or whose identities were reported to him in his capacity as bishop, excluding any
3 information obtained through communication with Mr. Coleman's attorneys. Neither the
4 attorney-client privilege nor priest-penitent privilege is waived.

5 2. In any briefing filed with the court by the parties, these non-party victims will
6 be referred to by initials only. In all other court filings by the parties, the names of these non-
7 party victims shall be redacted.

8 3. The disclosure by the counsel for the defendants of the names of these non-
9 party victims SHALL NOT be deemed a waiver in whole or in part of any defendants' claim
10 of confidentiality and/or privilege, either as to the specific information disclosed or as to any
11 other information relating thereto or on the same or related subject matter.

12 DATED this 12th day of January, 2006.

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15 GORDON, THOMAS, HONEYWELL,
MALANCA, PETERSON & DAHEIM LLP

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17 By: /s/ Michael T. Pfau
Michael T. Pfau, WSBA No. 24649
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19 LAW OFFICES OF TIMOTHY D. KOSNOFF

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21 By: /s/ Timothy D. Kosnoff
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Co-Counsel for Plaintiffs

STAFFORD FREY COOPER

By: /s/ Marcus B. Nash
Thomas D. Frey, WSBA No. 1908
Marcus B. Nash, WSBA No. 14471
Counsel for Defendants

II. ORDER

Based on the foregoing Stipulation, **IT IS SO ORDERED.**

DATED this ____ day of January, 2006.

HONORABLE RICARDO MARTINEZ

Presented by:

GORDON, THOMAS, HONEYWELL,
MALANCA, PETERSON & DAHEIM LLP

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