

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.,

NO. C04-2338 RSM

Plaintiffs,

**STIPULATION AND PROTECTIVE  
ORDER**

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.

**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)  
[fleming04-2388PO.doc]

LAW OFFICES  
GORDON, THOMAS, HONEYWELL, MALANCA,  
PETERSON & DAHEIM LLP  
ONE UNION SQUARE  
600 UNIVERSITY, SUITE 2100  
SEATTLE, WASHINGTON 98101-4185  
(206) 676-7500 - FACSIMILE (206) 676-7575

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

13 DATED this 12<sup>th</sup> day of January, 2006.

14  
15 GORDON, THOMAS, HONEYWELL,  
MALANCA, PETERSON & DAHEIM LLP

16  
17 By: /s/ Michael T. Pfau  
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Co-Counsel for Plaintiffs

19 LAW OFFICES OF 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 17 day of January, 2006.



**RICARDO S. MARTINEZ**  
UNITED STATES DISTRICT JUDGE

Presented by:

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

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