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The Honorable Marsha J. Pechman

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

A.B., by and through her next friend  
Cassie Cordell Trueblood, et al.,

Plaintiffs,

v.

Washington State Department of Social  
and Health Services, et al.,

Defendants.

NO. 14-cv-01178-MJP

**PROPOSED ORDER  
GRANTING STIPULATED  
MOTION FOR PROTECTIVE  
ORDER**

This matter comes before the Court upon the Parties' Stipulated Motion for a Protective Order. The Parties have requested that this Court enter an Order allowing Defendants to share specific and limited class member confidential information and materials with designated professional persons of the diversion service providers selected and funded by this Court.

IT IS HEREBY ORDERED

1. Confidential information that may be shared with designated professional persons of the diversion service providers is limited to the name, date of birth, and date when the individual was most recently a class member, in which court, and for which service (in-jail evaluation, inpatient evaluation, or restoration).

1 2. "Diversion service provider" is defined as only those service providers selected and  
2 funded by this Court through court order to provide diversion services pursuant to the  
3 Trueblood Diversion Plan. *See* ECF Nos. 390, 520, and 544.

4 3. "Designated professional person" is defined as a specific individual or individuals  
5 within a diversion service provider workforce who need access to the information to be  
6 disclosed pursuant to this order in order to carry out their duties. Prior to receiving any  
7 disclosures as contemplated in this order, the diversion service provider will identify  
8 the individual(s) that will receive these disclosures.

9 IT IS FURTHER ORDERED:

10 4. Defendants Washington State Department of Social and Health Services (DSHS) may  
11 share the limited confidential information described above with the designated  
12 professional person(s) of a diversion service provider. Disclosure of this information  
13 shall be at the discretion and direction of the Court Monitor.

14 5. In order for a diversion service provider to receive the limited disclosures contemplated  
15 within this order, the provider must agree to:

- 16 a. Keep that information as confidential as DSHS would otherwise have to keep it.  
17 b. May use the disclosed confidential information only for the purpose of  
18 identifying, locating, and targeting diversion services to class members as  
19 specified in the agreement that disperses Trueblood Diversion Funds from the  
20 federal court;  
21 c. The diversion service provider will not knowingly disclose confidential  
22 information to any person unless in accordance with governing federal, state,  
23 and local laws, and only after giving notice to DSHS so that it may intervene  
24 prior to disclosure if it believes disclosure is not legally authorized;

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d. Nothing in the agreement alters or nullifies the existing grant agreement between the diversion service provider and the Seattle Foundation.

Dated this 22<sup>nd</sup> day of March 2018.



THE HONORABLE MARSHA J. PECHMAN

Presented by:

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