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08-CV-05548-ORD

The Honorable JUDGE RONALD B. LEIGHTON

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

CRYSTAL AMMONS,

Plaintiff,

v.

STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND
HEALTH SERVICES; NORM
WEBSTER, individually and in his
official capacity acting under color of
state law; and MARY LAFOND,
individually and in her official capacity
acting under color of state law,

Defendants.

NO. C08 5548 RBL

STIPULATION AND
PROTECTIVE ORDER

I. STIPULATION

Come now Defendants State of Washington, Department of Social and Health Services, Norm Webster and Mary LaFond, by and through their attorneys of record, and Plaintiff Crystal Ammons, by and through her attorneys of record and hereby stipulate and agree to the entry of this Protective Order pursuant to Fed. R. Civ. P. 26(c).

It is stipulated that all records, information and evidence exchanged between the parties in this lawsuit are subject to this Protective Order and will not be disseminated to anyone

STIPULATION AND PROTECTIVE
ORDER


ATTORNEY GENERAL OF WASHINGTON
Torts Division
7141 Clearwater Drive SW
PO Box 40126
Olympia, WA 98504-0126
(360) 396-6300

1 outside this litigation. These records, information and evidence may be shared, relied upon,
2 utilized and offered as evidence by all parties in this lawsuit, including but not limited to the
3 attorneys staff, experts, and fact witnesses. Nothing herein shall be construed as prohibiting or
4 otherwise limiting Plaintiff's right to disseminate her own medical and/or psychological
5 records as she deems appropriate.
6

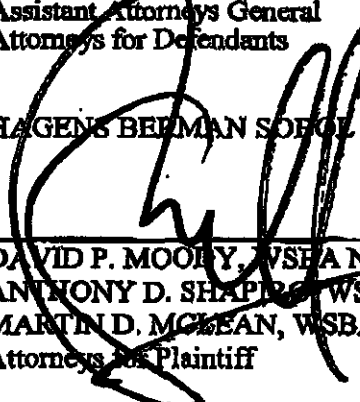
7 This Protective Order does not apply to records, information or evidence obtained by
8 Plaintiff and/or her attorneys, staff, experts or other persons before entry of this Order and/or to
9 records obtained from parties that are not named in this lawsuit.

10 DATED this 23 day of February, 2009.

11
12 ROBERT M. MCKENNA
13 Attorney General

14 
15 PATRICIA C. FETTERLY, WSBA No. 8425
16 IAN M. BAUER, WSBA No. 35563
17 Assistant Attorneys General
Attorneys for Defendants

18 Hagens Berman Sobel Shapiro LLP

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20 DAVID P. MOONEY, WSBA No. 22853
21 ANTHONY D. SHAPIRO, WSBA No. 12824
22 MARTIN D. MCLEAN, WSBA No. 33269
Attorneys for Plaintiff

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II. ORDER

Pursuant to the Stipulation of the parties, it is hereby

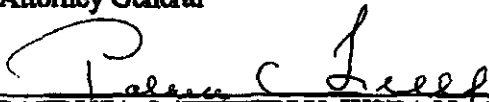
ORDERED that the foregoing Protective Order is entered and will remain in full force and effect until such time as this Court modifies its terms or releases the parties from its provisions.

DONE IN OPEN COURT this 24th day of February, 2009.


HONORABLE RONALD B. LEIGHTON

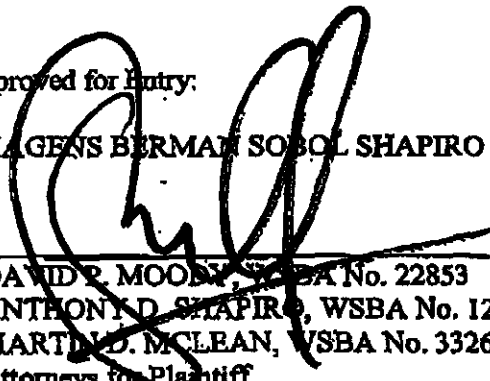
Presented by:

ROBERT M. MCKENNA
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PATRICIA C. FETTERLY, WSBA No. 8425
IAN M. BAUER, WSBA No. 35563
Assistant Attorneys General
Attorneys for Defendants

Approved for Entry:

HAGENS BERMAN SOBOL SHAPIRO LLP


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