

Hon. Marsha J. Pechman

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

TYRONE JOHNSON,

Plaintiff,

vs.

CITY OF OLYMPIA, et al.,

Defendants

NO. 3:17-cv-05403-MJP

STIPULATION AND AGREED  
PROTECTIVE ORDER

IT IS HEREBY STIPULATED by and between Beverly Grant and Elizabeth Lunde, counsel for Plaintiff herein, and John E. Justice, counsel for Defendants herein, that any records produced by the City of Olympia, in response to the Court's May 9, 2018 Order (Dkt. No. 44), will not be disclosed by plaintiff's counsel to anyone other than the attorneys of record or their retained experts, and plaintiff's counsel will return the produced employment records at the conclusion of this case. This stipulation does not address the use of these records in court proceedings in the above captioned case. Any such use will, if necessary, be addressed by motion.

**STIPULATION AND AGREED PROTECTIVE  
ORDER – 1**  
Cause No.: 3:17-cv-05403-MJP

LAW, LYMAN, DANIEL,  
KAMERRER & BOGDANOVICH, P.S.  
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1 Stipulated to this 23<sup>rd</sup> day of May, 2018.

2 LAW, LYMAN, DANIEL, KAMERRER BEVERLY GRANT LAW FIRM, P.S.  
3 BOGDANOVICH, P.S.

4 *s/ John E. Justice*

*s/ Beverly Grant*


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6 John E. Justice, WSBA No. 23042  
7 Attorneys for Defendants

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Beverly Grant, WSBA No. 8034  
Elizabeth Lunde, WSBA No. 51565  
Attorneys for Plaintiff

1 **ORDER**

2 THIS MATTER having come on before the above-entitled court upon stipulation of  
3 counsel, the court having examined the records and being fully advised in the matter, now,  
4 therefore, IT IS HEREBY ORDERED that any records produced by the City of Olympia, in  
5 response to the Court's May 9, 2018 Order (Dkt. No. 44), will not be disclosed by plaintiff's  
6 counsel to anyone other than the attorneys of record or their retained experts, and plaintiff's  
7 counsel will return the produced employment records at the conclusion of this case. This  
8 stipulation does not address the use of these records in court proceedings in the above  
9 captioned case. Any such use will, if necessary, be addressed by motion.  
10

11 DONE IN OPEN COURT this 23rd day of May, 2018.

12  
13   
14 Marsha J. Pechman  
15 United States District Judge

16 **Presented by:**

17 LAW, LYMAN, DANIEL, KAMERRER  
18 BOGDANOVICH, P.S.

19 s/ John E. Justice  
20 John E. Justice, WSBA No. 23042  
21 Attorneys for Defendants

22 **Approved as to form and  
23 notice of presentation waived:**

24 BEVERLY GRANT LAW FIRM, P.S.

25 s/ Beverly Grant  
26 Beverly Grant, WSBA No. 8034  
Elizabeth Lunde, WSBA No. 51565  
Attorneys for Plaintiff