

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

RONALD L. RHODES,

Plaintiff,

v.

Case No. 07-3228-CM-DJW

DON RAYMOND, et al.

Defendants.

AGREED PROTECTIVE ORDER
REGARDING CONFIDENTIAL INFORMATION

This matter comes before the court as an agreed order pursuant to Federal Rule of Civil Procedure 26(c). The plaintiff is an inmate confined in a Kansas Department of Corrections (“KDOC”) facility. This case may call into question security policies and procedures of KDOC correctional facilities, records of the Kansas Parole Board, mental health, criminal history information, disciplinary and investigation records pertaining to Plaintiff and other inmates in the possession or control of the KDOC and/or the InnerChange Freedom Initiative, Inc. (“IFI”), and personnel records for the employees and volunteers of the KDOC and IFI, all of which include private information and upon a showing of good cause in support of the entry of a protective order to protect the discovery and dissemination of confidential or proprietary information or information which will improperly annoy, embarrass, or oppress any party, witness, or person providing discovery in this case,

IT IS ORDERED:

1. This Protective Order shall apply to all documents, materials, and information, including without limitation, documents produced, answers to interrogatories, responses to requests for admission, deposition testimony, recordings, electronically stored information, and other information disclosed pursuant to the disclosure or discovery duties created by the Federal Rules of Civil Procedure.
2. Discovery materials that pertain to security operations of the KDOC, identify inmates other than the Plaintiff, or disclose confidential sources or intelligence gathering methods shall be redacted to protect the security of KDOC correctional facilities, the privacy of other inmates, confidential sources or intelligence gathering methodology.
3. Discovery materials pertaining to employment records of the KDOC shall be redacted consistent with the Kansas Open Records Act, K.S.A. 45-215 et seq. Discovery materials pertaining to employment records of IFI shall be redacted to protect the privacy of IFI employees and volunteers.
4. Any party that believes that information in discovery materials has improperly been redacted shall notify the other parties in writing. Within ten (10) days of receiving written notice, the parties must attempt to work out an agreement regarding the confidentiality of the materials; if such an

agreement cannot be reached, any party may file a motion to determine whether redaction of the material was appropriate.

IT IS SO ORDERED.

Dated this 18th day of August, 2008, at Kansas City, Kansas.

s/ David J. Waxse
David J. Waxse
U.S. Magistrate Judge