

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS**

SARA TAYLOR,)
)
Plaintiff,)
)
vs.)
)
CRAIG FITZGERALD TAYLOR)
and CRAIG TAYLOR d/b/a)
MOUNTAIN VALLEY EXPRESS)
)
Defendants.)
_____)

Case No. 13-1211 – CM

AGREED PROTECTIVE ORDER

The Wichita Police Department, in the above case, has been requested to release certain documents including investigative records and reports. The City of Wichita, by Elizabeth Harlenske, Assistant City Attorney, has asserted that such files contain irrelevant material, confidential material, and material which should be protected. Ms. Harlenske has agreed to produce such material, however, subject to a protective order.

WHEREUPON, THE COURT HEREBY ORDERS, ADJUDGES AND DECREES:

1. That the Wichita Police Department may release copies of its reports pertaining to **Sara Taylor; DOB: 04/04/1962; SSN: xxx-xx-9662** (Case Numbers if known, or request made).
2. That the parties to this lawsuit shall not copy, turn over or make available or disclose to any agency or person whatsoever any of the documents which have been provided from the Wichita Police Department files, except as stated in paragraph 3.
3. That the documents obtained from the files of the Wichita Police Department and any information gathered therefrom shall be treated as confidential and the same shall not be disclosed except as required in this case or unless referred to or testified to in open court. Further, documents obtained from such files shall not be attached to any pleading without an order of this Court upon a showing of necessity and relevancy.

4. The Wichita Police Department reserves the right to raise any objection to the production of any specific report which would be contrary to K.S.A. 45-221, K.S.A. 22-4701 *et seq.*, K.S.A. 38-1608, K.S.A. 38-2213 or any other statutory provision which prohibits the release of such investigatory records.

IT IS SO ORDERED.

s/ James P. O'Hara
U.S. Magistrate Judge

APPROVED:

s/Elizabeth Harlenske
Elizabeth Harlenske, #11059
Assistant City Attorney
Attorney for City of Wichita
E-mail: eharlenske@wichita.gov

s/Dustin L.DeVaughn
Dustin L. DeVaughn, #16559
Cody G. Claassen, #24554
DEVAUGHN JAMES
Attorneys for Plaintiff
12219 E. Central, Suite 250
Wichita, Kansas 67206
Phone: 316-977-9999
Fax: 316-425-0414
E-mail: ddevaughn@devaughnjames.com
cclaassen@devaughnjames.com

s/ Kevin M. McMaster
Kevin M. McMaster, #11903
Attorneys for Defendant
MCDONALD, TINKER, SKAER, QUINN
& HERRINGTON, P.A.
P.O. Box 207
Wichita, Kansas 67201-0207
Phone: (316) 263-5851
Fax: (316) 263-4677
E-mail: kmcmaster@mcdonaldtinker.com