IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS

ANNA SPALDING,)
Plaintiff,))
vs. CITY OF ENTERPRISE, KANSAS; BRONSON CAMPBELL, in his individual and official capacities; and SCOTT BABCOCK, in his individual and official capacities,)) Case No. 15-1282-JTM-JPO)))
Defendants.)))

AGREED PROTECTIVE ORDER

NOW, on this 10th day of February, 2016, the Court hereby enters a protective order pursuant to Fed. R. Civ. P. 26(c). This case presents a claim alleging that excessive force was used during plaintiff's arrest causing her physical injury which may lead to the discovery of a) plaintiff's confidential medical records, b) personnel files of the individual defendants and/or the City defendant's current or former employees which are deemed confidential by state law, and c) law enforcement investigative documents and files relating to this incident and other incidents involving plaintiff.

For good cause shown, the Court orders that any such above-described confidential documents produced or disclosed during this litigation shall be used only for purposes of this lawsuit.

The Court further orders:

1. That access to said above described confidential records obtained under this

Protective Order shall be limited to the parties, their counsel, clerical and staff persons

employed by counsel, court reporters (if necessary), expert witnesses, and the Court;

2. That their use shall be restricted to pretrial, trial, and appellate proceedings in

this case;

3. That such confidential documents may be filed under seal only upon

separate, specific motion and order of the Court;

4. That within thirty (30) days after the conclusion of this litigation, all copies

of the confidential documents produced under this Protective Order shall either be returned

to the appropriate counsel or stored and destroyed in accordance with the involved law

firm's regular document retention policy.

IT IS SO ORDERED.

James P. O'Hara

JAMES P. O'HARA

U. S. MAGISTRATE JUDGE

APPROVED:

s/ Michael Shultz

Michael Shultz, #23133

Email: michael@shultzlaw.net

Attorney for Plaintiff

SHULTZ LAW OFFICE, P.A.

445 North Waco

Wichita, KS 67202

Phone: (316) 269-2284

Fax: (316) 269-2011

2

s/ Charles E. Millsap

Charles E. Millsap, #09692

Email: cmillsap@fleeson.com

Attorney for Defendant City of Enterprise, Kansas Fleeson, Gooing, Coulson & Kitch, L.L.C.

1900 Epic Center, 301 N. Main

Wichita, KS 67202

Phone: (316) 267-7361 Fax: (316) 267-1754

s/ Edward L. Keeley

Edward L. Keeley, #09771

Email: ekeeley@mcdonaldtinker.com

Attorney for Defendants Campbell and Babcock

McDonald, Tinker, Skaer,

QUINN & HERRINGTON, P.A.

300 West Douglas, Suite 500

Wichita, KS 67202

Phone: (316) 263-5851 Fax: (316) 263-4677