

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

(1) TABATHA BARNES, )  
(2) TERRI MORRIS, )  
(3) SYRITA BOWEN, )  
(4) CARLA JOHNSON, )  
(5) KALA LYLES, )  
(6) JANNIE LIGONS, )  
(7) SHANDAYREON HILL, )

Plaintiffs, )

v. )

NO. CIV-16-0184-HE

(1) CITY OF OKLAHOMA CITY, )  
a municipal corporation, et al., )

Defendants. )

**PROTECTIVE ORDER**

The parties in the above-referenced case agree that certain documents and information being exchanged or produced in this case should be treated as confidential.

For purposes of this Protective Order, confidential information and documents include any person’s medical records, any person’s mental health records, and City of Oklahoma City personnel, law enforcement, and/or investigative records which are not otherwise an open record as defined by Oklahoma law. Because of the sensitive and private nature of these identified information and documents, they should be treated as confidential by the parties.

A party who obtains confidential material or information in the course of this litigation shall not disclose or use it in any manner other than to prosecute or defend this litigation. This Protective Order shall not restrict a party who obtains or produces confidential material or information from disclosing or using the confidential material or information in the

ordinary course of business in the prosecution or defense of this case, so long as the party maintains confidentiality with respect to the materials or information.

All parties shall mark confidential material and information with the readily visible word "CONFIDENTIAL." Failure to mark a document does not destroy the confidential nature of the document if a party produced it and communicated the intent that it remain confidential. A party who intends to present confidential materials or information to the Court after the date of this Order shall, when possible, present such confidential material and information to the Court in a generic manner without revealing confidential information. If it is not possible to present confidential material and information to the Court in a generic manner without revealing confidential information, the party shall redact the document to the extent possible, or request to submit the document under seal, pursuant to the Local Rules.

The provisions of this Protective Order shall continue in effect after the conclusion of this action. All confidential material and information shall be maintained in accordance with this Protective Order. Recipients are to destroy confidential City of OKC personnel files when the lawsuit is finally concluded, but nothing in this Order shall require any person or entity to destroy any other original document that is or contains confidential material.

Nothing in this Confidentiality Agreement and Protective Order shall prevent any party from seeking an order of the Court determining that some or all of the Protected Documents, Protected Testimony, and protected information are not and do not contain confidential information, and therefore are not subject to the provisions of this Protective Order. This Court retains and shall have jurisdiction over the parties and recipients of the

Protected Documents and Protected Testimony for enforcement of the provisions of this Order following termination of this litigation.

Nothing in this Confidentiality Agreement and Protective Order prohibits any party from objecting at trial to the admissibility of the records or information contained in them which is the subject of this Protective Order.

**IT IS SO ORDERED.**

Dated this 20th day of July, 2016.

  
JOE HEATON  
CHIEF U.S. DISTRICT JUDGE