

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

TABATHA BARNES, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. CIV-16-184-HE
	)	
THE CITY OF OKLAHOMA CITY,	)	
a municipal corporation, et al.,	)	
	)	
Defendants.	)	

**DEFENDANT CITY OF OKLAHOMA CITY’S MOTION TO FILE CERTAIN  
EXHIBITS UNDER SEAL**

**COMES NOW** Defendant City of Oklahoma City and respectfully requests leave to file certain exhibits under seal.

In order to comply with the Protective Order [Doc. No. 43] and ECF Policy H(1)(b) and (2), the undersigned would request leave to file Exhibits 89 (Polygraph Report of Holtzclaw), 90 (California Psychological Report of Holtzclaw) and 91 (Minnesota Psychological Report of Holtzclaw) to its Brief in Support of its Motion for Summary Judgment under seal.

Respectfully submitted,

KENNETH JORDAN  
Municipal Counselor

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Attorneys for Defendants City

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8<sup>th</sup> day of September, 2021, I electronically transmitted the attached Defendant City's Motion to File Certain Exhibits Under Seal to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the ECF registrants on file herein.

/s/ Sherri R. Katz \_\_\_\_\_