

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

1.	SHERRY ELLIS, <i>et al.</i> ,)	
)	
	Plaintiffs,)	
)	
v.)	CIV-2016-019-HE
)	
1.	DANIEL HOLTZCLAW, <i>et al.</i> ,)	
)	
	Defendants.)	

**APPLICATION FOR AGREED PROTECTIVE ORDER
WITH PLAINTIFFS AND DEFENDANT CITY OF OKLAHOMA CITY**

COME NOW the Plaintiffs Sherry Ellis and Carla Raines and Defendant City of Oklahoma City, and respectfully move this Court to enter the Agreed Protective Order, submitted to this Court via email. In support of this Application, the parties show this Court as follows:

1. The parties have been and are currently engaged in written discovery and document production;
2. Certain documents and information have been requested in this case which the parties believe to be confidential; and,
3. The parties have agreed to protect against the disclosure of certain information to certain persons outside of this case through proposed Agreed Protective Order.

WHEREFORE, all premises considered, the parties respectfully request this Court's approval of the proposed Agreed Protective Order, which will be submitted for the Court's consideration via email.

RESPECTFULLY SUBMITTED THIS 6th DAY OF MAY 2019.

s/ Mark Hammons

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CERTIFICATE OF SERVICE

☒ I hereby certify that on this 6TH day of MAY, 2019, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants;

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