

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**JOANNA CASTRO,
PLAINTIFF**

V.

**ALBERT SALINAS,
DEFENDANT**

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CIVIL NO. 5:18-CV-00312-DAE

JOINT MOTION FOR PROTECTIVE ORDER

TO THE HONORABLE UNITED STATES DISTRICT COURT

COME NOW PLAINTIFF JOANNA CASTRO and DEFENDANTS SALINAS, CITY OF OLMOS PARK (“City”) and Chief RENE VALENCIANO (“Valenciano”)¹ (collectively “the Parties”) and file this Joint Motion for Protective Order requesting that this Court grant this motion, and in support would show the Court as follows:

1. Plaintiff seeks discovery from Defendants to include responses to Plaintiff’s Interrogatories, Requests for Production, and depositions of Salinas, Valenciano and other employees of the City (“Deponents”).
2. Defendants seek to protect and keep confidential Defendants’ answers to Interrogatories, production of documents and things in response to Plaintiff’s Requests for Production, and video and non-video deposition testimony of Deponents, from the dissemination, publication, posting, broadcasting, referencing, and copying, on the internet and other broadcast media to include: YouTube, and Plaintiff’s and Third Parties’ internet, cell phone, and social media accounts. The protective order is sought to protect sensitive and confidential information of police officers; and

¹ Subject to Defendants City’s and Valenciano’s 12(b) Motion to Dismiss Plaintiff’s Second Amended Complaint.

confidential information of criminal investigations, arrests and convictions of third parties from disclosure and publication.

3. The Parties have conferred and agree to the matters listed in the Protective Order and request that this Court enter and make a part of the record in this case for all purposes the attached Protective Order.

PRAYER

The Parties request that the Court grant the Parties Joint Motion for Protective Order and enter and make a part of the record in this case for all purposes the attached Protective Order, and for such other and further relief to which the Parties may be justly entitled.

SIGNED this 27th day of March, 2019.

Respectfully submitted,

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