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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF ARIZONA**

9 Johnny Wheatcroft and Anya Chapman, as
husband and wife, and on behalf of minors
10 J.W. and B.W.,

11 Plaintiffs,

12 v.

13 City of Glendale, a municipal entity; Matt
Schneider, in his official and individual
14 capacities; Mark Lindsey, in his official and
individual capacities; and Michael Fernandez,
15 in his official and individual capacities,

16 Defendants.

NO. 2:18-cv-02347-SMB

**JOINT MOTION FOR
PROTECTIVE ORDER**

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18 The parties jointly move for a Protective Order since the City of Glendale,
19 Matt Schneider, Mark Lindsey and Michael Lindsey (collectively “Defendants”) will
20 produce certain items, information, and documents that contain the identity of a police
21 officer who is the complainant in an internal workplace harassment complaint within the
22 Glendale Police Department (“Officer”). The parties agree that the Officer’s identity shall
23 remain confidential and not available for dissemination to the general public, including
24 the media, but instead shall remain confidential, known by and shared only with this Court
25 and its staff, the parties, their respective attorneys, representatives, agents, consultants,
26 and experts involved in this lawsuit, and any trial witness or deponent during the course of
27 their testimony. The documents containing the Officer’s identity include disciplinary
28 memos, audio recorded interviews and transcripts of interviews, complaint reports,

1 complaints, allegations summaries, Notices of Investigation, and an event timeline related
2 to Complaint No. 2017-055 (“Confidential Items”).

3 Due to the nature of these Confidential Items and pursuant to their
4 agreement, the parties jointly request that the Court enter the attached proposed Protective
5 Order, which sets forth the procedure for the handling of such confidential information
6 during the course of this litigation. The parties have agreed to the terms set forth in the
7 proposed Protective Order.

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9 DATED this 20 day of May 2019.

10 ATTORNEYS FOR FREEDOM

JONES, SKELTON & HOCHULI, P.L.C.

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12 By /s/ Jody L. Broaddus (with permission)

By /s/ Joseph J. Popolizio

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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of May 2019, I caused the foregoing
document to be filed electronically with the Clerk of Court through the CM/ECF System
for filing; and served on counsel of record via the Court’s CM/ECF system.

I further certify that on 20th day of May 2019, I have served the forgoing
documents to the following:

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/s/Melissa Ward