

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:15-CV-00166-WJM-NYW

TAMMY FISHER

Plaintiff,

v.

BRIAN KOOPMAN, Detective in the Loveland, Colorado Police Department, in his official and individual capacity;
LUKE HECKER, Chief of Loveland Police Department, in his official and individual capacity,

Defendants.

**JOINT MOTION FOR ENTRY OF A STIPULATED PROTECTIVE ORDER AS AN
ORDER OF THE COURT**

The Parties to the above-captioned matter, by and through their respective undersigned counsel, jointly move this Court to enter the Parties' proposed Stipulated Protective Order, filed contemporaneously herewith, as an Order of the Court, to protect the discovery and dissemination of certain limited confidential information. In support of this Motion, the Parties state as follows:

1. The Parties agree that a Protective Order is necessary to protect certain, limited confidential information to be produced as part of disclosures and discovery.
2. The Parties submit the attached proposed Stipulated Protective Order, which counsel for each Party has reviewed and approved.
3. Good cause exists for the issuance of the attached proposed Stipulated Protective

Order for the reasons stated in the proposed Order and the reasons stated above.

WHEREFORE, the Parties respectfully request that this Court enter the Stipulated Protective Order as an Order of the Court.

s/

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-AND-

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CERTIFICATE OF SERVICE (CM/ECF)

I hereby certify that on _____, I electronically filed the foregoing **STIPULATION** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following at their email address. I also emailed a courtesy copy as follows:

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s/ A. Elise Herding _____
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