

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

CITIZENS PROJECT, COLORADO
LATINOS VOTE, LEAGUE OF WOMEN
VOTERS OF THE PIKES PEAK REGION,
BLACK/LATINO LEADERSHIP
COALITION,

Plaintiffs,

v.

No. 1:22-cv-1365-CNS-MDB

CITY OF COLORADO SPRINGS, and
SARAH BALL JOHNSON, in her official
capacity as City Clerk,

Defendants.

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

The parties jointly move this Court to enter the accompanying Stipulated Protective Order Governing Confidential Information and Documents pursuant to Federal Rule of Civil Procedure 26(c). The parties are interested in permitting the exchange of discovery to proceed without delay occasioned by disputes about the confidential nature of the documents and/or information sought and/or produced. The Stipulated Protective Order specifies the conditions under which private, sensitive, and/or legally confidential documents and information in possession of the parties must be exchanged, used, and protected in this litigation, and authorizes the parties to disclose that information in response to discovery requests.

The parties, therefore, respectfully request that the attached Stipulated Protective Order Governing Confidential Information and Documents be adopted by order of the Court.

Dated: December 12, 2022

Respectfully submitted,

OFFICE OF THE CITY ATTORNEY
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/s/ W. Erik Lamphere

/s/ Theresa J. Lee

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**federal practice only*