

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No: 22-cv-01365-CNS-MDB

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

Plaintiffs,

v.

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

Defendants.

STIPULATED ORDER PURSUANT TO FED. R. EVID. 502(d)

The parties request this Court issue an order pursuant to Fed. R. Evid. 502(d) to facilitate production and the use of documents in this proceeding and to protect the parties against waiver of privileges and protections attached to electronic and hard copy data, information and documents.

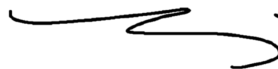
For good cause shown, the Court hereby enters the following order pursuant to Fed. R. Evid. 502(d) governing the production of electronic and hard copy data, information and documents which may contain information covered by the attorney-client privilege or the work production privilege.

It is hereby ordered that, pursuant to Fed. R. Evid. 502(d), a party's disclosure or production of any document or information in this proceeding shall not, for purposes of this proceeding or any

other proceeding in any other court, constitute a waiver by that party of the attorney-client privilege or work product protection applicable to those documents. Any party receiving any such produced documents or information shall notify the producing party and return them, upon request, within seven (7) days of receiving such request and delete any versions of the document it maintains and make no use of the information contained therein, regardless of whether the receiving party agrees with the claim of privilege and/or work product protection.

Notwithstanding any other directives of this Order, if a party receiving a produced document disagrees with the producing party's claim that certain documents or information are privileged, the receiving party may move the Court for an order compelling production. Any such motion shall be filed within seven (7) days of receiving the request described in the preceding paragraph. Any such motion shall not disclose or otherwise refer to the content of the material in dispute beyond the information set forth in a privilege log. The receiving party is not subject to the directives of the preceding paragraph until the Court resolves the motion. The receiving party is enjoined from using the disputed material until the motion is resolved.

IT IS SO ORDERED that the Parties' Joint Motion for Stipulated Order Pursuant to Fed. R. Evid. 502(d).



Maritza Dominguez Braswell
United States Magistrate Judge

Dated this 30th of May, 2023.