

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

MICHAEL DRIVER, TERRY CLAYTON,  
MICHAEL BOYD, NICHOLAS SWORDS, and  
ROY SHOFNER, individually and as  
representatives of a class of all similarly situated  
individuals,

Plaintiffs,

v.

THE MARION COUNTY SHERIFF, and THE  
CONSOLIDATED CITY OF INDIANAPOLIS  
AND MARION COUNTY,

Defendant.

Cause No. 1:14-cv-02076-RLY-MJD

**MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**

Defendant, Marion County Sheriff, pursuant to Federal Rules of Civil Procedure 26(c), with the agreement of Plaintiff, and Co-Defendants, moves the Court for entry of a Stipulated Protective Order and states:

1. Certain documents and information have been and may be sought, produced or exhibited by and between the parties to this action are protected information such as trade secrets, non-public research and development, commercial or financial information, protected law enforcement records, or other information that may cause harm to the producing party or a non-party, more specifically detailed in the Agreed Protective Order.

2. The parties desire to maintain the confidentiality of such documents and have prepared the attached Stipulated Protective Order.

WHEREFORE, Defendant, Marion County Sheriff, respectfully request that the Court enter the proposed Stipulated Protective Order.

FROST BROWN TODD LLC

By: /s/Anthony W. Overholt

Anthony W. Overholt, #16481-49

Attorneys for Defendant, The Marion County  
Sheriff

**CERTIFICATE OF SERVICE**

I hereby certify that on this 19<sup>th</sup> day of June, 2015, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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