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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF PIERCE

JOSEPH J. KIRBY and DEBORAH A.  
KIRBY, husband and wife,

Plaintiffs,

v.

THE CITY OF TACOMA, a municipal corporation; RAY CORPUZ and "JANE DOE" CORPUZ, husband and wife; PHILIP ARREOLA and "JANE DOE" ARREOLA, husband and wife; WILLIAM WOODARD and CATHERINE WOODARD, husband and wife; RAYMOND ROBERTS and "JANE DOE" ROBERTS, husband and wife; DAVID BRAME and "JANE DOE" BRAME, husband and wife; and JAMES HAIRSTON and "JANE DOE" HAIRSTON, husband and wife,

Defendants.

No. 99-2-13911-4

DEFENDANTS' MOTION FOR  
A PROTECTIVE ORDER RE:  
REQUEST FOR ADMISSIONS  
AND DISCOVERY IN COUNTY CLERK'S OFFICE

A.M. SEP 13 2001 P.M.  
PIERCE COUNTY WASHINGTON  
TED RUTT, COUNTY CLERK  
BY \_\_\_\_\_ DEPUTY

NOTE FOR HEARING:  
September 21, 2001

3 SEP 14 2001

COMES NOW the defendants, City of Tacoma, Ray Corpuz, Philip Arreola, William Woodard, Catherine Woodard, Raymond Roberts, David Brame and James Hairston, by and through their undersigned attorney, Shelley M. Kerslake, Assistant City Attorney for the City of Tacoma, and moves this Court pursuant to CR 26(c) for an Order Granting Defendants' Motion for a

Defendants' Motion for Protective Order Re:  
Request for Admissions and Discovery - 1


**ORIGINAL**

Tacoma City Attorney  
Civil Division  
747 Market Street, Room 1120  
Tacoma, Washington 98402-3767  
(253) 591-5885/FAX 591-5755

1 Protective Order Re: Request for Admissions and Discovery. This motion is  
2 based upon the above-referenced court rules and is supported by the  
3 Memorandum in Support of Defendants' Motion for a Protective Order Re:  
4 Request for Admissions and Discovery and Affidavit of Shelley M. Kerslake in  
5 Support of Defendants' Motion for a Protective Order Re: Request for  
6 Admissions and Discovery.

7 DATED this 13 day of September, 2001.

8 ROBIN S. JENKINSON, City Attorney  
9 ELIZABETH A. PAULI, Ch. Asst. City Atty.

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12 By:   
13 SHELLEY M. KERSLAKE  
14 WSBA# 21820  
15 Attorney for Defendants  
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