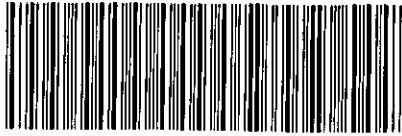
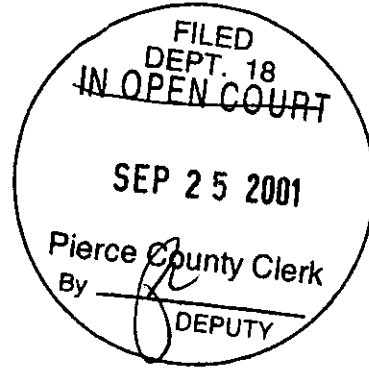


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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF PIERCE

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

No. 99-2-13911-4

Plaintiffs,

v.

STIPULATION,
PROTECTIVE ORDER AND
ORDER SEALING RECORDS

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.

STIPULATION

COMES NOW the defendants by and through their attorney, Shelley M.
Kerslake, and the plaintiff, by and through his attorney, John L. Messina, and
stipulate that a protective order will be entered by the court in this matter.

6 SEP 26 2001

STIPULATION, PROTECTIVE ORDER
AND ORDER SEALING RECORDS - 1

ORIGINAL

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


0000 3427

This order is required to protect information which if disclosed, or inquired about, will annoy and embarrass a named party, and has no relevance to this case, nor is calculated to lead to any admissible evidence.

MESSINA BULZOMI

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

By: *approved via fax*
JOHN L. MESSINA
WSBA# 4440
Attorney for Plaintiffs

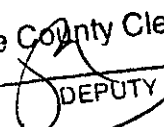
By: 
SHELLEY M. KERSLAKE
WSBA# 21820
Attorney for Defendants

ORDER

Based upon the foregoing stipulation, the court hereby enters an order precluding further inquiry, mentioning in front of a jury or further discovery into criminal allegations raised against Assistant Chief David Brame, which were neither sustained, nor charged in a criminal court.

Furthermore, any information received to date on this subject will be restricted from public dissemination by any party to this action, and the court file as to this motion will be sealed.

DATED this 24th day of September, 2001.

FILED
DEPT. 18
~~IN OPEN COURT~~
SEP 25 2001
Pierce County Clerk
By  DEPUTY



HONORABLE KAREN L. STROMBOM

02200 3420

Presented by:

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

By: 
SHELLEY M. KERSLAKE
WSBA# 21820
Assistant City Attorney
Attorney for Defendants

Approved as to form; Notice of
Presentment Waived:

MESSINA BULZOMI

By: Approved by facsimile.
(See attached.)
JOHN L. MESSINA
WSBA# 4440
Attorney for Plaintiffs

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
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JOSEPH J. KIRBY and DEBORAH A.
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THE CITY OF TACOMA, a municipal
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husband and wife; WILLIAM WOODARD
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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

STIPULATION,
PROTECTIVE ORDER AND
ORDER SEALING RECORDS

STIPULATION

COMES NOW the defendants by and through their attorney, Shelley M.
Kerslake, and the plaintiff, by and through his attorney, John L. Messina, and
stipulate that a protective order will be entered by the court in this matter.

09/18/01

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This order is required to protect information which if disclosed, or
inquired about, will annoy and embarrass a named party, and has no relevance
to this case, nor is calculated to lead to any admissible evidence.

MESSINA BULZOMI

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

By: *John L. Messina*
JOHN L. MESSINA
WSBA# 4440
Attorney for Plaintiffs

By: _____
SHELLEY M. KERSLAKE
WSBA# 21820
Attorney for Defendants

ORDER

Based upon the foregoing stipulation, the court hereby enters an order
precluding further inquiry, mentioning in front of a jury or further discovery into
criminal allegations raised against Assistant Chief David Brame, which were
neither sustained, nor charged in a criminal court.

Furthermore, any information received to date on this subject will be
restricted from public dissemination by any party to this action, and the court file
as to this motion will be sealed.

DATED this _____ day of _____, 2001.

HONORABLE KAREN L. STROMBOM

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Presented by:

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

By:

SHELLEY M. KERSLAKE
WSBA# 21820
Assistant City Attorney
Attorney for Defendants

Approved as to form; Notice of
Presentment Waived:

MESSINA BULZOMI

By:

John L. Messina
JOHN L. MESSINA
WSBA# 4440
Attorney for Plaintiffs