

99-2-13911-4 4778221 MT 04-28-03

2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

FILED  
IN COUNTY CLERK'S OFFICE  
PIERCE COUNTY, WASHINGTON

A.M. DEC 26 2001 P.M.

BOB SAN SOUCIE  
COUNTY CLERK  
BY \_\_\_\_\_ DEPUTY

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 PRE-HIRE FILES

NOTE FOR HEARING:  
January 4, 2002

COMES NOW the defendants, City of Tacoma, Ray Corpuz, Philip  
Arreola, William Woodard, Catherine Woodard, Raymond Roberts, David

Defendants' Motion for Protective Order - 1

**ORIGINAL**

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


6 DEC 27 2001

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

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 Protective Order Re: Request for Pre-Hire Files. This motion is based upon the above-referenced court rule and is supported by the Memorandum in Support of Defendants' Motion for a Protective Order, Affidavit of James O. Hairston and Affidavit of Shelley M. Kerslake in Support of Defendants' Motion for a Protective Order.

DATED this 20 day of December, 2001.

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

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