

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

SHERRY DIANE IVANOVSKI,

Plaintiff,

Case No: 07-10731

-vs-

HONORABLE GEORGE CARAM STEEH
HONORABLE MONA K. MAJZOUB

CITY OF DEARBORN HEIGHTS,
POLICE OFFICER SCOTT KELLER,
in his individual capacity, and
POLICE OFFICER M. GUZOWSKI, in
his individual capacity, jointly and severally,

Defendant.

DIB, FAGAN AND BRAULT, P.C.
By: BARRY S. FAGAN (P-34275)
Attorneys for Plaintiff
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CUMMINGS, McCLOREY, DAVIS & ACHO, P.L.C.
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**PROTECTIVE ORDER REGARDING POLICIES AND
PROCEDURES OF THE DEARBORN HEIGHTS POLICE DEPARTMENT**

Plaintiff having served upon Defendants a Request for Production of Documents including “[a]ll policies and procedures of the Dearborn Heights Police Department regarding

arrests, requests/recommendations for charges, and the use of force by police officers, in effect at the time of the incident in question,” Defendant, CITY OF DEARBORN HEIGHTS, having served its Objections to said Request for Production of Documents, the parties having agreed to the terms of this Protective Order, and the Court being fully advised in the premises;

IT IS HEREBY ORDERED that the City of Dearborn Heights produce the policies and procedures of the Dearborn Heights Police Department regarding arrests, requests or recommendations for charges, and the use of force by police officers, in effect at the time of the incident in question under the following conditions:

1. Production of the policies and procedures of the Dearborn Heights Police Department does not constitute a waiver of Defendants’ objections to their use, applicability or admissibility in this litigation or any other litigation.

2. The production of the policies and procedures of the Dearborn Heights Police Department is for discovery purposes in this litigation only, shall be maintained in confidence by counsel, except as set forth in Paragraph 4, and shall be used only for the purpose of this litigation and no other purpose.

3. The production of the policies and procedures of the Dearborn Heights Police Department does not waive or limit Defendants’ ability to pursue subsequent motions in limine, motion for protective order, or motion for summary judgment regarding these documents, their applicability or admissibility in this litigation or any other litigation.

4. The policies and procedures of the Dearborn Heights Police Department may be used as necessary by Plaintiff’s Counsel in this case, including at depositions, filings with the

court, court proceedings and at trial to the extent admissible. Plaintiff's Counsel may also disclose such information to his staff, to Plaintiff, and to expert witnesses in this litigation. Plaintiff's Counsel shall advise such individuals of the substance of this Protective Order and that they are bound by its terms.

5. Plaintiff, her attorneys, and experts are bound by these terms through stipulation of Plaintiff's counsel to this Order and each agrees that all copies are to be returned to counsel for the City of Dearborn Heights by plaintiff's attorney upon conclusion of this litigation, including all appeals.

Dated: October 09, 2007

s/ Mona K. Majzoub
MONA K. MAJZOUB
U.S. MAGISTRATE JUDGE

APPROVED AS TO
FORM AND SUBSTANCE:

s/ with consent of BARRY S. FAGAN (P34275)
Attorney for Plaintiff

s/ JEFFREY R. CLARK (P33074)
Attorney for Defendants