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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

ADREE EDMO,)	Case No. 1:17-cv-151-BLW
)	
Plaintiff,)	
vs.)	STIPULATED MOTION FOR ENTRY
)	OF PROTECTIVE ORDER RE: PSI
IDAHO DEPARTMENT OF)	REPORTS
CORRECTION; HENRY ATENCIO, in)	
his official capacity; JEFF ZMUDA, in)	
his official capacity; HOWARD KEITH)	
YORDY, in his official and individual)	
capacities; CORIZON, INC.; SCOTT)	
ELIASON; MURRAY YOUNG;)	
RICHARD CRAIG; RONA SIEGERT;)	
CATHERINE WHINNERY; AND)	
DOES 1-15;)	
)	
Defendants.)	
_____)	

COME NOW the parties to this action, by and through their counsel of record, hereby stipulate and agree to the entry of a *Protective Order* in the above-entitled matter, pursuant to Federal Rule of Civil Procedure 26(c), to govern the designation, disclosure, and use of confidential documents contained in Presentence Investigation Reports (PSI Reports) to be disclosed in this matter. The parties have met and conferred on this issue and agree that this *Stipulation* may be entered for the following reasons:

1. The Defendant Idaho Department of Corrections (IDOC) has in its custody and possession two (2) PSI Reports regarding the Plaintiff.

2. The PSI Reports were prepared in conjunction with the Plaintiff's two (2) prior criminal convictions in the District Court of the Sixth Judicial District for the State of Idaho in 2009 and in 2012.

3. The PSI Reports are in the custody and possession of IDOC pursuant to the District Court's sentencing orders regarding the Plaintiff's criminal cases, along with Idaho Criminal Rule 32, Idaho Administrative Rule 32, and Idaho Code §§ 19-2519(b) and 20-237.

4. The PSI Reports contain confidential documents, including evaluations, regarding the Plaintiff and her victims.

5. On July 11, 2018, IDOC filed a *Motion to Disclose Presentence Investigation Reports* with the sentencing District Court, pursuant to Idaho Criminal Rule 32(h)(3).

6. Also on July 11, 2018, the Hon. District Judge Robert C. Naftz entered an *Order* authorizing IDOC to disclose the PSI Reports to the parties, expert witnesses, and this Court in the instant matter.

For those reasons, and in order to govern the disclosure and use of the confidential and sensitive documents included in the PSI Reports and their attachments, the parties to this matter hereby stipulate for the entry of a *Protective Order*, in the form attached hereto.

DATED this 3rd day of August, 2018.

/s/ Shaleen Shanbhag
Shaleen Shanbhag
Attorney for Plaintiff

DATED this 3rd day of August, 2018.

/s/ Dylan Eaton
Dylan Eaton
Attorney for Corizon Defendants

DATED this 3rd day of August, 2018.

/s/ Marisa S. Crecelius
Marisa S. Crecelius
Attorney for IDOC Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of August, 2018, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

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