

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

INGRID BUQUER, <i>et al.</i>,)	
)	Cause No. 1:11-cv-0708-SEB-MJD
Plaintiffs,)	
)	
v.)	
)	
CITY OF INDIANAPOLIS, <i>et al.</i>,)	
)	
Defendants.)	

PROTECTIVE ORDER

Plaintiffs Ingrid Buquer, Berlin Ortiz, and Louisa Adair (referred to as “Plaintiffs”) and Defendants the Marion County Prosecutor in his official capacity and the Johnson County Prosecutor in his official capacity (referred to as “State Defendants”) seek an order protecting privacy interest and confidentiality of the Plaintiffs’ immigration documents that are currently in the possession of Plaintiffs’ counsel, Angela Adams. It is hereby ordered as follows:

1. The immigration records of Ingrid Buquer that are currently in the possession of Plaintiffs’ counsel, Angela Adams, are confidential in nature and should be considered as such by all parties and counsel to this matter.

2. The immigration records of Berlin Ortiz that are currently in the possession of Plaintiffs’ counsel, Angela Adams, are confidential in nature and should be considered as such by all parties and counsel to this matter.

3. The immigration records of Louisa Adair that are currently in the possession of Plaintiffs’ counsel, Angela Adams, are confidential in nature and should be considered as such by all parties and counsel to this matter.

4. The immigration records of the Plaintiffs that are currently in the possession of Plaintiffs' counsel, Angela Adams, shall be disclosed only to State Defendants' counsel and members of the office of State Defendants' counsel.

5. If the State Defendants determine that disclosure of the immigration records that are currently in the possession of Plaintiffs' counsel, Angela Adams, is warranted or necessary pursuant to litigation in this matter, State Defendants shall contact counsel for Plaintiffs to request to disclose the immigration records.

6. Disclosure of the immigration records that are currently in the possession of Plaintiffs' counsel, Angela Adams, to anyone other than the individuals listed in paragraph 4 shall be permitted upon express written permission of Plaintiffs.

7. If State Defendants determine that the immigration records that are currently in the possession of Plaintiffs' counsel, Angela Adams, or a portion thereof are necessary for filing with the Court in this matter, the immigration records are to be filed under seal pursuant to the S.D. Local Rule 5.3.

8. This protective order concerns only the immigration records of the above named Plaintiffs that are currently in the possession of Plaintiffs' counsel, Angela Adams, and does not allow the State Defendants, or any other party, access to any other otherwise confidential immigration records or other confidential records without the consent of the Plaintiffs.

9. This Order shall continue to be binding throughout and after the conclusion of this litigation, including all appeals. Within thirty days of settlement or final adjudication, including but not limited to final adjudication of any appeals, all immigration records produced in this litigation shall be returned to counsel for Plaintiffs.

Date: 06/16/2011

Copies to:

Counsel of record