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**IN THE THIRD JUDICIAL DISTRICT COURT
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH**

STATE OF UTAH,

Plaintiff,

v.

JASON CHRISTOPHER HALL,

Defendant.

**STIPULATED MOTION FOR
PROTECTIVE ORDER**

Case No: 221906445

Judge Paul B. Parker

The State of Utah and the Defendant, Jason Christopher Hall, by and through undersigned counsel of record, respectfully submit this Stipulated Motion for a Protective Order.

The State filed charges against the Defendant on June 30, 2022. The charges consist of one count of threatening elected officials with assault, one count of stalking, and one count of threatening to influence official or public action. The one count of threatening elected officials with assault is a third-degree felony offense, and both the stalking and threatening to influence official or public action counts are class A misdemeanors.

On August 29, 2022, the Defendant issued a subpoena to the City of Bluffdale. Bluffdale responded that some of the documents responsive to the subpoena were sensitive and confidential

and requested that a Protective Order be issued in this case before disclosure. Likewise, the State has also issued its own subpoena to the City of Bluffdale and it anticipates that material responsive to the subpoena may also need to be protected. The State and Defendant's counsel discussed a Protective Order to protect this sensitive information.

Therefore, the Defendant and State respectfully request an Order that the parties shall maintain these materials from Bluffdale City in a manner consistent with the terms of this protective order and that the materials shall be stored in a secure manner in boxes, files, folders, and electronic media marked "UNDER PROTECTIVE ORDER – DO NOT DISCLOSE." Either party may designate materials protective under this order with good cause after consultation with the non-designating party, and with proper written notification of the designation.

The Defendant and State further request that the parties be required to give a copy of this Protective Order to all individuals or entities engaged or consulted by the State, as well as Defense counsel, in preparation of any trial/hearing in this case. A knowing and willful violation of this Protective Order by the parties or others may result in contempt of court proceedings or other civil/criminal sanctions.

In addition, the Defendant and State request that either party may use materials covered by this Protective Order in an open hearing after bringing the matter first to the Court's attention.

Finally, the Defendant and State request that the provisions of this order governing disclosure and use of the materials shall not terminate at the conclusion of this criminal prosecution.

A Proposed Order is submitted herewith.

DATED this 18th day of October, 2022.

ARMSTRONG TEASDALE LLP

/s/ Trinity Jordan

D. Loren Washburn

Trinity Jordan

Emily Nuwan

Attorneys for Defendant

DATED this 18th day of October, 2022.

/s/ Steven A. Wuthrich

Steven A. Wuthrich

Sean D. Reyes

Attorneys for Plaintiff, State of Utah

*Electronic Signature affixed with permission
via email 10/18/2022.*

CERTIFICATE OF SERVICE

I hereby certify that on October 18th, 2022, I caused a true and correct copy of the
STIPULATED MOTION FOR PROTECTIVE ORDER to be sent via electronic mail to the
following:

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/s/ Shelby Irvin

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