

Velva L. Price  
Travis County District Clerk  
PO Box 679003  
Austin TX 78767-9003

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**Receipt****Location: 4****Employee: 51**

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**Transaction Information****Transaction Type:** CIVIL OTHER COSTS**ID:** CP-17-000002**Amount Due:** \$3.00**Convenience Fee:** \$3.00**Total Amount Due:** \$6.00

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**Payment Information****Payment Method:** Credit Card**Card Type:** VISA**Card Holder Name:** TARA CUNNINGHAM**Reference #:** 102345**Transaction #:** BLOPE4065673**Authorization #:** 111111**Processed Date:** 02/01/2017**Processed Time:** 01:17:13 PM

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**Transaction Details**

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**Phone #:** N/A

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Thank you for your payment!

Your credit card statement will reflect this transaction with the name  
GOVERNMENT PAYMENTS.

If you have any questions regarding your credit card transaction, you can call us  
at 956-682-3466 during our business hours of 8:00 AM to 5:00 PM Central  
Standard Time on Monday through Friday

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JAN 05 2017

CAUSE NO. D-1-GN-16-004769

At 2:15 p. M.  
Velva L. Price, District Clerk

DAVID A. ESCAMILLA, TRAVIS  
COUNTY ATTORNEY,  
*Plaintiff,*

v.

KEN PAXTON, ATTORNEY GENERAL  
OF TEXAS,  
*Defendant.*

§ IN THE DISTRICT COURT OF  
§  
§  
§  
§ TRAVIS COUNTY, TEXAS  
§  
§  
§ 261st JUDICIAL DISTRICT

**AGREED PROTECTIVE ORDER**

This is an open records lawsuit. Plaintiff David A. Escamilla, Travis County Attorney (the County), seeks a declaratory judgment pursuant to the Public Information Act (the PIA), Tex. Gov't Code § 552.324, that certain information collected, assembled, or maintained by the County is excepted from required disclosure under the PIA (information at issue). The Attorney General requires a copy of the information at issue in order to prepare for trial. Tex. Gov't Code § 552.322 permits the discovery of information at issue under a protective order. The parties agree to this protective order.

IT IS THEREFORE ORDERED that, upon receipt of this signed order, the County shall provide to the Attorney General a copy of the information at issue in this suit, subject to the following conditions:

1. The copies produced are to remain in the sole custody of the attorneys for the Attorney General.
2. The copies produced may be disclosed only to the following persons:
  - (1) the attorneys working on this action on behalf of the Attorney General; and
  - (2) secretarial and paralegal assistants working under their supervision, only to the extent necessary to perform work directly related to this action.



3. Disclosure may be made to the individuals listed in paragraph 2 only after each individual has been made aware of the provisions of this Agreed Protective Order and has indicated their assent, by initialing a copy of this Agreed Protective Order, to be bound by it.

4. At trial, in support of a motion for summary judgment, or at any other stage in this suit where it is deemed necessary to submit the information at issue to the Court for a determination of the applicability of any claimed exception to disclosure, the information at issue shall be submitted to the Court at the time of the hearing for *in camera* inspection, pursuant to the sealing provisions of Tex. Gov't Code § 552.3221. The parties hereby agree and waive any objection to a motion for summary judgment on the basis that such protected documents were not attached to or filed with the motion for summary judgment.

5. Upon termination of this litigation by an order that has become final due to the expiration of the time to appeal or when all appeals have been exhausted or by settlement, the Attorney General shall securely destroy all paper copies of the information produced and securely erase all electronic copies of the information produced.

6. Violations of this Agreed Protective Order shall be enforceable by and subject to sanctions under the Court's contempt power.

7. All documents produced in this open records lawsuit are deemed produced under this Agreed Protective Order, pursuant to Tex. Gov't Code § 552.322.

8. The parties may by written agreement modify the terms of this Agreed Protective Order consistent with the Texas Public Information Act and the Rules of Civil Procedure. The Court on its own motion or by motion of the parties may modify this Agreed Protective Order.

Signed this 5<sup>th</sup> day of January, 2017.

  
JUDGE PRESIDING

**TIM SULAK**

AGREED:



TIMOTHY LABADIE  
Assistant Travis County Attorney  
State Bar No. 11784853  
David Escamilla, Travis County Attorney  
P.O. Box 1748  
Austin, Texas 78767  
Telephone: (512) 854-9513  
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ATTORNEY FOR PLAINTIFF



MATTHEW R. ENTSMINGER  
State Bar No. 24059723  
Chief, Open Records Litigation  
Administrative Law Division  
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ATTORNEY FOR DEFENDANT

Velva L. Price  
District Clerk  
Travis County  
D-1-GN-16-004769  
Irene Silva

CAUSE NO. D-1-GN-16-004769

DAVID A. ESCAMILLA, TRAVIS  
COUNTY ATTORNEY,  
*Plaintiff,*

v.

KEN PAXTON, STATE OF TEXAS  
ATTORNEY GENERAL,  
*Defendant.*

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IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

261st JUDICIAL DISTRICT

**RULE 11 SCHEDULING AGREEMENT**

Pursuant to Rule 11 of the Texas Rules of Civil Procedure, the parties, David A. Escamilla, Travis County Attorney, and Ken Paxton, Attorney General of Texas, agree to the following schedule:

1. Cross-motions for summary judgment will be filed on February 15, 2017;
2. Responses to summary judgment motions will be filed on March 1, 2017;
3. Hearing on cross-motions for summary judgment will be scheduled for March 8, 2017, at 9:00 o'clock a.m.; and
4. If necessary, a trial on the merits will be scheduled for March 28, 2017, at 9:00 o'clock a.m.



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