

DISTRICT COURT, EL PASO COUNTY, COLORADO Court Address: 270 South Tejon Street Colorado Springs, Colorado 80903	FILED Document CO El Paso County District Court 4th JD Filing Date: May 28 2009 10:11AM MDT Filing ID: 25382239 Review Clerk: Sharon Robinson
Plaintiff: John Doe v.	
Defendants: The Colorado Springs Police Department and Colorado Springs Police Chief Richard Myers	▲ COURT USE ONLY ▲
Attorneys for Plaintiff: Richard D. Radabaugh, #33655 Mark H. Barker, #34798 Richard Callison, #32658 David G. Berry, #39865 Radabaugh, Barker & Callison, Ltd. 309 East St. Vrain Street Colorado Springs, CO 80903 Phone: (719) 632-9909 Fax: (719) 632-1478	Case No.: Div.: Ctrm:
MOTION FOR <i>IN CAMERA</i> HEARING	

COMES NOW John Doe (hereinafter sometimes referred to as "Plaintiff"), by and through his counsel, Radabaugh, Barker & Callison, Ltd., moves this Court to hold an *in camera* hearing for testimony, argument and review of all records related to this case as follows:

1. The Plaintiff has brought this action for the purpose of preventing the release of certain past employment records.
2. The Plaintiff would suffer great harm should the records in question be made public. Plaintiff works in a managerial position in private industry; termination would certainly result from release of the record. Plaintiff also owns and operates a side business which contracts with radio stations and would likely result in loss of contracts. Plaintiff's long-term marriage would be severely affected by the release of this record, as would their seven year old son.
2. An open hearing on the information contained within the record would have the same effect as release of the record.

WHEREFORE, Plaintiff respectfully requests this Court to hold an *in camera* hearing for testimony, argument and review of all records related to this case.

RESPECTFULLY SUBMITTED this 26 day of May, 2009.

Respectfully submitted,

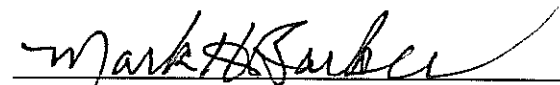


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CERTIFICATE OF SERVICE

I certify that on 5-26-09 (date), I mailed, faxed, e-filed, or hand-delivered a copy of this Order to the following:

City of Colorado Springs
Office of the City Attorney
30 S. Nevada Avenue
Colorado Springs, CO 80903


Signed