

IN THE IOWA DISTRICT COURT FOR LEE (SOUTH) COUNTY

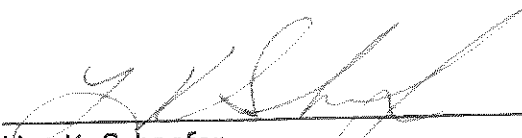
STATE OF IOWA, vs. BENJAMIN G. TRANE,	Plaintiff, Defendant.	NO. FECR009152 DISCOVERY AGREEMENT REGARDING CONFIDENTIAL MATERIALS
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COMES NOW the State of Iowa, the Defendant, and Defendant's attorney and jointly enter into the following stipulation regarding discovery in this case:

1. The discovery in this case is voluminous and contains the identifying information of hundreds of persons. To redact all such information prior to providing the discovery materials to the defense would unduly delay the disclosure of said materials.

2. The parties have agreed that such information should not be disclosed or otherwise revealed to any person or entity other than the attorneys directly involved in this case, consultants/expert who will review some or all of the documents to prepare their analysis of the issues of this case, or the parties or the employees' of the parties to the extent they review any of these documents in connection with their work on this case.

Approved as to form and content:



Lisa K. Schaefer
Attorney for Defendant

10-27-17

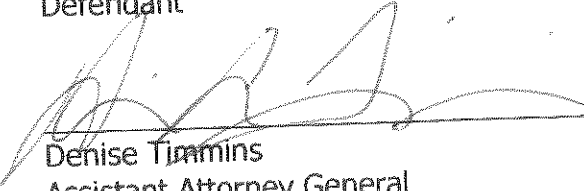
Date



Benjamin G. Trane
Defendant

8/27/17

Date



Denise Timmins
Assistant Attorney General

10 27 17

Date