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DATE FILED: November 2, 2016 4:28 PM

*People v. Dear, 15CR5795*

**Response to Third-Party Plaintiffs'  
Gag Order Position Paper**

**Exhibit A**

<p>District Court, El Paso County,  Court Address: 270 South Tejon  Colorado Springs, CO 80903  Phone Number: (719) 452-5446</p> <hr/> <p><b>People of the State of Colorado,  Plaintiff,</b></p> <p>VS</p> <p><b>ROBERT LEWIS, DEAR, JR.,  Defendant</b></p>	<p style="text-align: center;"><b>▲ COURT USE ONLY ▲</b></p>
<p><b>Attorneys for Planned Parenthood Federation of America,  Inc.; Rocky Mountain Planned Parenthood, Inc., a/k/a  Planned Parenthood of the Rocky Mountains, Inc.:</b></p> <p>Stuart Pack, Atty. Reg. #6779  Lisa K. Mayers, Atty. Reg. # 23335  Spencer Fane, LLP  1700 Lincoln Street, Suite 2000  Denver, CO 80203-4554  Telephone: (303) 839-3800;  Facsimile: (303) 839-3838  E-mail: <a href="mailto:spack@spencerfane.com">spack@spencerfane.com</a>; <a href="mailto:lmayers@spencerfane.com">lmayers@spencerfane.com</a></p> <p>Kevin S. Taylor, Atty. Reg. #20209  Kyle D. Seedorf, Atty. Reg. #33928  Taylor Anderson LLP  1670 Broadway, Suite 900  Denver, CO 80202  Telephone: 303-551-6651; Facsimile: (303)  Telephone: 303-551-6651;  Facsimile: (303) 551-6655  E-mail: <a href="mailto:ktaylor@talawfirm.com">ktaylor@talawfirm.com</a>; <a href="mailto:kseedorf@talawfirm.com">kseedorf@talawfirm.com</a></p> <p><b>Attorneys for Samantha Wagner A.S, Mandy Davis and  Ammar Laskarwala:</b></p> <p>Kirk R. McCormick Atty. Reg. #: 16563  McCormick &amp; Murphy, P.C.  929 West Colorado Avenue  Colorado Springs, CO 80905  Phone Number: (719) 389-0400</p>	<p>Case Number: 15CR5795</p> <p>Division: 10</p> <p>Courtroom: W570</p>

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**LIMITED ENTRY OF APPEARANCE AND JOINT REQUEST TO BE HEARD  
AT UPCOMING HEARING**

The undersigned counsel hereby enter their appearance in this matter for the limited purpose of filing this motion, pursuant to C. R. Crim. P. 47, requesting this Court to permit them to appear and be heard at the hearing scheduled for October 18, 2016 at 9:00 a.m. The undersigned counsel represent the Plaintiffs and Defendants in a civil

action pending in the District Court for the City and County of Denver, Civil Action No. 16 CV 31798, styled as: *Samantha Wagner, Ashley Stewart, A.S., a minor child acting through her Mother and next Best Friend, Ashley Stewart, Mandy Davis and Ammar Laskarwala v. Planned Parenthood Federation of America, Inc., and Rocky Mountain Planned Parenthood, Inc., a/k/a Planned Parenthood of the Rocky Mountains, Inc.* ("Wagner Litigation"). The undersigned counsel wish to discuss with the Court, prosecuting counsel, and defense counsel, discovery issues in the Wagner Litigation, and in particular the need for access to information in this criminal proceeding that the Court has placed under seal.

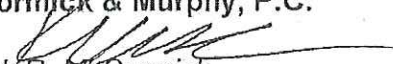
The undersigned counsel offer to provide the Court and all counsel of record with position papers on the issues they wish to discuss in advance of the hearing, if the Court so desires.

This pleading has been filed under seal pursuant to this Court's previous order, and the undersigned request that it remain sealed.

DATED this 13<sup>th</sup> day of October, 2016.

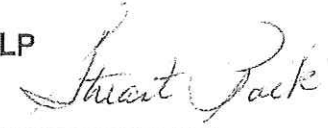
Respectfully submitted by:

**McCormick & Murphy, P.C.**

  
/s/ Kirk R. McCormick  
Kirk R. McCormick

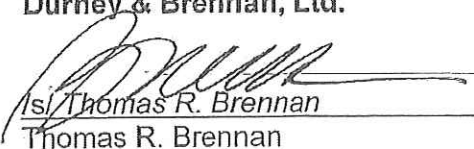
And

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Stuart Pack  
Lisa K. Mayers

And

**Durney & Brennan, Ltd.**

  
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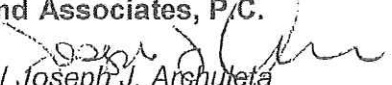
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### CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2016, the foregoing, was filed UNDER SEAL with the clerk of court via ICCES and served upon the following:

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