

REDACTED

District Court, El Paso County,
Court Address: 270 South Tejon
Colorado Springs, CO 80903
Phone Number: (719) 452-5446

**People of the State of Colorado,
Plaintiff,**

vs

**ROBERT LEWIS, DEAR, JR.,
Defendant**

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Inc.; Rocky Mountain Planned Parenthood, Inc., a/k/a
Planned Parenthood of the Rocky Mountains, Inc.:**

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FILED IN THE DISTRICT AND
COUNTY COURTS OF
EL PASO COUNTY, COLORADO
DATE FILED: October 31, 2016
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DR. LYNETTE CORNELIUS
CLERK OF COURT

▲ COURT USE ONLY ▲

Case Number: 15CR5795

Division: 10

Courtroom: W570

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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 13th day of October, 2016.


Respectfully submitted by:

McCormick & Murphy, P.C.


/s/Kirk R. McCormick
Kirk R. McCormick

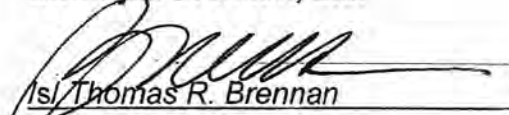
And

Spencer Fane LLP


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And

Durney & Brennan, Ltd.


/s/ Thomas R. Brennan
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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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