IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

MITCHELL J. STONEBARGER,	)	
Petitioner,	)	**Case No.: 17SL-DR04596-02**
v.	)	**Division: 4**
NATASHA D. HAGINS,	)	
Respondent.	)	

FILED
DEC 19 2023
JOAN M. GILMER
CIRCUIT CLERK, ST. LOUIS COUNTY

QUALIFIED PROTECTIVE ORDER
(Manchester P.D. Records)

The undersigned, on behalf of the Manchester Police Department, was served a Subpoena for records on or about November 2, 2023 and thereafter objected on or about November 10, 2023. This subpoena contained requests for records relating to Petitioner and Respondent from October 1, 2023 through November 2, 2023, which includes documents, statements, and video of the minor children of Petitioner and Respondent herein. The Court, in its October 13, 2023 Order, *inter alia*, ordered the Guardian ad litem to have access to all police records related to this matter. The Manchester Police Department, is prepared to comply with the Subpoena for records subject to this Court's October 13, 2023 Order and this Court's Qualified Protective Order, as follows:

IT IS THEREFORE ORDERED that the Manchester Police Department disclose the records requested by the Petitioner's Subpoena Duces Tecum, as above described, directly to the Guardian ad litem, Ms. Laura Stobie, Esq., and are herein referred to as the "Protected Records."

IT IS FURTHER ORDERED that the disclosure shall be made on the following conditions:

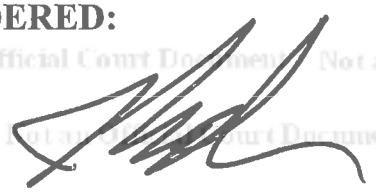
1. The Manchester Police Department will Bates Label each page and disc of the records disclosed **"CONFIDENTIAL-PRODUCED SUBJECT TO PROTECTIVE ORDER"** or similar.
2. No Protected Records shall be e-filed or filed with the Court except by Order of this Court and with the appropriate level of security applied by the Clerk of the Court.
3. Protected Records shall be stored or transmitted in a sealed envelope with the following label:

   CONFIDENTIAL-SUBJECT TO PROTECTIVE ORDER:
   TO BE OPENED BY GUARDIAN AD LITEM IN CONNECTION WITH THE ADJUDICATION OF ANY ISSUE IN THIS LITIGATION. FILED PURSUANT TO PROTECTIVE ORDER DATED _____.
4. Once the Protected Records are received, opened, and reviewed by the Guardian ad Litem, the Guardian ad Litem shall provide the records to the parties.
5. The parties or persons receiving the records and/or information pursuant to this order shall either return the records and/or information disclosed pursuant to this order to the Manchester Police Department or destroy all the records and/or information (including all copies made) at the end of the litigation or proceeding. This return/destruction is limited by any applicable court rules requiring members of the Bar to retain documents received in litigation for a specified period. At the conclusion of such time, the records and/or information are to be returned or destroyed.

6. The parties or persons receiving the records and/or information pursuant to this order are prohibited from using or disclosing the same for any purpose other than the litigation or proceeding for which the information is requested.
7. No Protected Records shall be retained by any individual or organization or entity after the conclusion of this action or after the conclusion of the appeal of the judgment in this action, except by the legal guardians of the minor children herein. Protected Records shall be destroyed in a verifiable manner 31 days after the conclusion of this action or the conclusion of the appeal of this action.
8. This Order, in conjunction with the Court's October 13, 2023 Order, shall be construed to authorize and compel the City of Manchester Police Department to produce to the Guardian ad Litem the records in its possession involving or related to Mitchell J. Stonebarger and/or Natasha D. Hagins from October 1, 2023 through November 2, 2023. Complying with this Court Order and the Court's October 13, 2023 Order shall absolve the City of Manchester and the Manchester Police Department from any further duties under the Subpoena for Taking Deposition dated November 2, 2023 filed by Counsel for the Petitioner. Further, the City of Manchester and the Manchester Police Department shall be absolved from any liability regarding the disclosure of such records.

IT IS FURTHER ORDERED that the Clerk provide a copy of this Order to all parties or attorneys of record herein.

SO ORDERED:



12/19/23

Hon. Jeffrey P. Medler **Division 4** **Date**
Circuit Judge

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Respectfully submitted,

CUNNINGHAM, VOGEL & ROST, P.C.

By: /s/ *Joshua H. Saleem*
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was filed electronically with the Clerk of the Court, to be served by operation of the Court's electronic filing system on this 19th day of December, 2023, to the following:

Nathan S. Cohen, Esq.
210 South Bemiston Avenue
St. Louis, Missouri 63105
Attorney for Petitioner

Natasha D. Hagins
Respondent Pro Se
1 Elannachester Drive
Manchester, MO 63011

Laura Stobie, Esq.
825 Maryville Centre Dr #300,
Chesterfield, Missouri, 63017
Guardian ad Litem

/s/ Joshua Saleem

/s/ Paul V. Rost

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