

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

Jenny E. Haas,

Plaintiff,

vs.

City of Alexander City and Chief  
Ronnie Betts

Defendants.

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CV-05-1182-C

**DEFENDANT'S MOTION FOR ENTRY OF HIPAA ORDER**

COMES NOW the Defendant, by and through counsel, and respectfully requests this Honorable Court to sign and enter the attached HIPAA Order in this case. Said Order is necessary so that the Defendant may obtain mental health records which are relevant and material to the claims asserted against the Defendant by the Plaintiff in this case.

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully requests this Honorable Court to sign and enter the attached HIPAA Order so that the Defendant may utilize said order to begin discovery of relevant and material medical information with respect to the Plaintiff.

Respectfully submitted this the 24<sup>th</sup> day of May, 2006.

  
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RICK A. HOWARD (RAH045)  
Attorney for Defendant

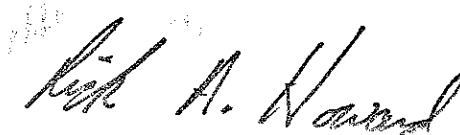
OF COUNSEL:  
NIX HOLTSFORD GILLILAND HIGGINS & HITSON, P.C.  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served upon:

Jon C. Goldfarb, Esquire  
Maury S. Weiner, Esquire  
Kell A. Simon, Esquire  
Wiggins, Childs, Quinn & Pantazis LLC  
301 19<sup>th</sup> Street North  
Birmingham, Alabama 35203

by placing same in the United States Mail, postage prepaid, on this the 24<sup>th</sup> day of May, 2006.



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OF COUNSEL