

STIPULATION FOR PROTECTIVE AGREEMENT

Case Caption: MORPHEW, SUZANNE

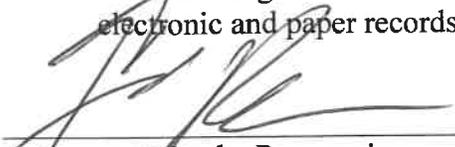
Docket Number/Date: D0022025CR000128

NMS Labs Case Number Workorder 24076012 and 24081593

DATE FILED
March 31, 2026 4:54 PM

National Medical Services, INC., dba NMS Labs, the El Paso County Prosecutor's office for the state of Colorado and Barry Morphew by and through his/her Fisher & Byrialsen, PLLC, hereby stipulate and agree as follows:

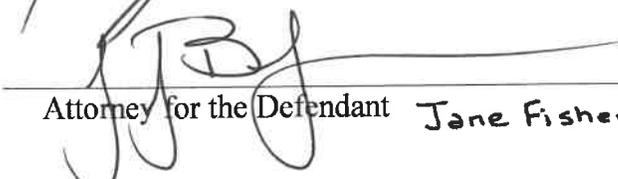
1. NMS Labs' Standard Operating Procedures (SOPs) and Methods are the proprietary and work product property of NMS Labs;
2. A request for discovery has been made for a copy of the NMS Labs SOPs and/or Methods in the above entitled action;
3. Upon receipt of a valid subpoena, NMS Labs will provide one electronic copy of the SOPs and/or Methods to the requestor;
4. NMS Labs reserves the right to redact non-essential proprietary content not directly relevant to the case;
5. Dissemination of provided documents is limited to persons directly involved in litigation for the above entitled case;
6. Additional copies and reproductions of the SOPs and/or Methods, including posting on the Internet or social media sites, other than as expressly permitted herein is strictly prohibited;
7. The above parties agree that they will file a joint stipulated motion to seal the court record to protect any portions of NMS Labs SOPs and/or Methods entered into the record;
8. The authority for the reproduction of the SOPs and/or Methods pursuant to this stipulation is not a transfer of any of the rights by NMS Labs;
9. Dissemination of the SOPs and/or Methods pursuant to this agreement does not place NMS Labs SOPs and/or Methods in the public domain;
10. This stipulation is binding upon the employees, contractors, related parties, and successors of the parties in this matter;
11. Once the litigation is concluded and the period for filing of appeals has run, all parties shall expunge all electronic and paper records of NMS Labs SOPs and/or Methods.



Attorney for the Prosecution

3/27/26

Date



Attorney for the Defendant Jane Fisher-Byrialsen Date 3/27/26

**People's
Exhibit**

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