

EXPEDITE
 No Hearing Set
 Hearing is Set
 Date: December 16, 2020
 Time: 8:30 am
 Judge/Calendar: Ex Parte

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
 IN AND FOR THE COUNTY OF THURSTON

THURSTON COUNTY SHERIFF'S OFFICE

Plaintiff,

vs.

WASHINGTON STATE DEPARTMENT OF
 CORRECTIONS; and CJ CIARAMELLA,

Defendants.

No.: 20-2-02461-34

cm
~~(PROPOSED)~~ TEMPORARY RESTRAINING
 ORDER

Ex Parte

This matter having come ~~on regularly~~ *Ex Parte* before the above-titled court, pursuant to Plaintiff's motion for a temporary restraining order; ~~the Plaintiff's appearing by and through its attorneys of record; the Defendant, Washington State Attorney General's Office appearing by and through~~ Assistant Attorney General; and the Defendant CJ Ciaramella appearing; Plaintiff's counsel having provided reasonable notice to the Attorney General's Office and CJ Ciaramella of its intention to seek the relief sought herein and the basis therefor; the court having considered the complaint, Plaintiff's memorandum in support of its motion, and the supporting declarations of Acting Undersheriff Ray Brady and Deputy Prosecuting Attorney Karen Horowitz, and being otherwise fully advised in this matter, and believing that the requested relief is proper, and specifically a temporary restraining order is appropriate as it appears that disclosure of certain information requested by CJ Ciaramella concerning records related to an open and active homicide investigation led by Thurston

1 County Sheriff's Office (the Reinoehl incident) ^{may be} ~~is~~ exempt from disclosure under RCW 42.56.240(1), the
2 non-disclosure of such records is essential to effective law enforcement, and disclosure would irreparably
3 harm vital government functions under RCW 42.56.540; now, therefore, it is hereby ^{likely} ~~is~~ ^{likely} **ORDERED**:

4 1. Defendant Washington State Department of Corrections is restrained ~~pending further order~~
5 ~~of the court~~ ^{temporarily} from releasing the following records: all incident reports, weapon discharge
6 reports, or use of force reports filed by officers or agents involved in the Sep. 3., 2020
7 shooting of Michael Forest Reinoehl in Lacey, Washington, and any body camera footage or
8 still photographs related to the September 3, 2020 shooting of Michael Forest Reinoehl in
9 Lacey, Washington pursuant to any request for the same from CJ Ciaramella; and

10 2. This temporary restraining order shall remain in effect until 5 p.m. on January 8, 2021.
11 *A* motion for preliminary injunction, ^{is scheduled} on Friday, the 8th day of Jan., 2021 at 9:00 a.m., or
12 as soon thereafter as the matter may be heard. Pursuant to CR 65(b), the court finds good
13 cause to allow this temporary restraining order to extend for a period beyond 14 days, because
14 December 25, 2020 and January 1, 2021 are judicial holidays and there are otherwise no
15 available calendars to address the motion for preliminary injunction; and

16 3. Plaintiff Thurston County Sheriff's Office, as a governmental entity, is not required to
17 provide security pursuant to CR 65(c).

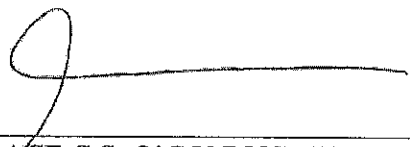
18 *4. All parties must file timely pleadings (and serve all other parties) for the*
motion scheduled for January 8, 2021, before Judge Skinder. No Judges
FAILURE TO APPEAR ON THE DEFENDANTS' PART TO APPEAR AND *Copies*
19 **SHOW CAUSE AT THE ABOVE-TITLED DATE AND TIME MAY RESULT IN** *shall*
ENTRY OF AN ORDER IN ACCORDANCE WITH THE TERMS HEREIN. *be provided.*

21 ~~DONE IN OPEN COURT~~ this 16th day of December, 2020, at 9:14 (a.m./p.m.).

23 Carol Murphy
JUDGE

1 Presented by:

2 JON TUNHEIM
3 PROSECUTING ATTORNEY

4 

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7 Attorney for Thurston County Sheriff's Office
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